Final Environmental Impact Report (Final EIR)

[State Clearinghouse No. 2012041003]

for

Los Angeles International Airport (LAX)
Northside Plan Update

Volume III

Responses to Comments and Corrections and Additions to the Draft EIR

Final Environmental Impact Report
This document (Volume III), along with Volume IV, comprises the second and final part of the Environmental Impact Report (EIR) for the LAX Northside Plan Update and supplements the Draft EIR for the LAX Northside Plan Update (Consisting of Volume I and Volume II), previously circulated for pubic review and comment. The LAX Northside Plan Update EIR is available for review at Los Angeles World Airports (LAWA) Administrative Offices, One World Way, Suite 218, Los Angeles, CA 90045.

City of Los Angeles
Los Angeles World Airports

December 2014

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PREFACE

This document, in conjunction with the previously prepared documents described below, constitutes the Final Environmental Impact Report (Final EIR) for the Los Angeles International Airport (LAX) Northside Plan Update (proposed Project). The proposed Project would update the 1989 Design Plan and Development Guidelines for the LAX Northside and permit a maximum of 2,320,000 square feet of development on the approximately 340 acre Project site. In order to allow for flexibility of future development to respond to future market conditions, transfers and exchanges of uses and development rights will be allowed within limited areas of the Project site, not to exceed any specified environmental constraints, provided that all development and design standards are met. In order to implement the proposed Project, the LAX Specific Plan will be amended and the1989 Design Plan and Development Guidelines for LAX Northside will be updated, among other actions.

In accordance with the California Environmental Quality Act (CEQA), Los Angeles World Airports (LAWA), as Lead Agency, completed an EIR to address and disclose the potential environmental impacts associated with the proposed Project. LAWA circulated a Draft EIR regarding the proposed Project, received public and agency comments on the Draft EIR, and prepared written responses to those comments - all of which provides the basis for this Final EIR.

Pursuant to CEQA Guidelines §15132, a Final EIR consists of:

(a) The Draft EIR or a revision of the draft.

(b) Comments and recommendations received on the Draft EIR either verbatim or in summary.

(c) A list of persons, organizations, and public agencies commenting on the Draft EIR.

(d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.

(e) Any other information added by the Lead Agency.

Accordingly, the Final EIR for the proposed Project consists of two components, as follows:

Component 1: Draft EIR and Technical Appendices

Volume I - Draft EIR: Volume I of the Final EIR includes the Draft EIR Main Document, Chapters Executive Summary (ES) through 9.

Volume II - Appendices: Volume II of the Final EIR includes technical Appendices to the Draft EIR. The Appendices include Appendix A: Initial Study and Notice of Preparation; Appendix B: Scoping Period Public Comments; Appendix C: Air Quality and Greenhouse Gas Technical Reports; Appendix D: Noise Technical Report; Appendix E: Traffic Study; Appendix F: Biological Resources Technical Report; Appendix G: Mature Tree Survey; Appendix H: Geotechnical Report; Appendix I: Paleontological Resources Assessment; Appendix J: Hazardous Materials Technical Memorandum; Appendix K: Hydrology Technical Memorandum; Appendix L: Land Use Policy Analysis; Appendix M: Shade-Shadow Analysis; and, Appendix N: Water Supply Assessment and Will Serve Letter.

Component 2: Responses to Comments and Corrections and Additions to the Draft EIR

Volume III - Responses to Comments and Corrections and Additions to the Draft EIR: The second part of the Final EIR consists of a compilation of the comments received on the Draft EIR, and written responses prepared by LAWA to those comments. This document includes indices (i.e., lists) of agencies, organizations, and individuals that commented on the Draft EIR, and provides a copy of the comment letters in their original form (i.e., photocopies of comment letters). This document also includes other information, including corrections and additions to information presented in the Draft EIR, which have been added by LAWA as part of the Final EIR.

Volume IV – Final EIR Appendices: Volume IV of the Final EIR includes Appendices to the Final EIR. The Appendices include Appendix A: Original Comment Letters on the LAX Northside Plan Update; Appendix B: Additional Traffic Analysis; and Appendix C: Revised Air Quality Technical Report Tables.

All of the documents described above, comprising the Final EIR for the proposed Project, are available for public review at the following locations:

- LAWA Administrative Offices, One World Way, Suite 218, Los Angeles, CA 90045
- Westchester-Loyola Village Branch Library, 7114 West Manchester Avenue, Los Angeles, CA 90045
- Playa Vista Branch Library, 6400 Playa Vista Drive, Los Angeles, CA 90094
- El Segundo Library, 111 West Mariposa Avenue, El Segundo, CA 90245
- Inglewood Library, 101 West Manchester Boulevard, Inglewood, CA 90301
- Culver City Library, 4975 Overland Avenue, Culver City, CA 90230

The Final EIR is also available at www.ourlax.org.

1 Introduction

1.1 Introduction

In compliance with the California Environmental Quality Act (CEQA), Los Angeles World Airports (LAWA) has completed this Final Environmental Impact Report (Final EIR) for the Los Angeles International Airport (LAX) Northside Plan Update (proposed Project). As described in the Preface of this document, the Final EIR for the proposed Project consists of two components, with the first component consisting of Volumes I and II - Draft EIR and associated Technical Appendices for the proposed Project and the second component being Volume III - Responses to Comments and Corrections and Additions to the Draft EIR. This document, Volume III, constitutes the second component of the Final EIR.

1.1.1 Draft EIR

A detailed description of the proposed Project is provided in Volume I of the EIR (see Chapter 2 in the Draft EIR). On May 15, 2014, LAWA published a Draft EIR for the proposed Project. In accordance with CEQA, the Draft EIR was circulated for public review for 45 days, with the review period originally closing on June 30, 2014. LAWA extended the public review period to July 21, 2014 in response to community requests for additional time to review the Draft EIR. A public workshop was held on June 11, 2014, during the comment period.

As explained in more detail in Volume I of the EIR, the proposed Project would update the 1989 Design Plan and Development Guidelines for LAX Northside and permit a maximum of 2,320,000 square feet on the approximately 340 acre Project site. In order to allow for flexibility of future development to respond to future market conditions, transfers and exchanges of uses and development rights will be allowed within limited areas of the Project site, not to exceed any specified environmental constraints, provided that all development and design standards are met. In order to implement the proposed Project, the LAX Specific Plan will be amended and the 1989 Design Plan and Development Guidelines for LAX Northside will be updated, among other actions.

The proposed Project would permit a mix of employment, retail, restaurant, office, hotel, research and development, higher education, civic, airport support, recreation, and buffer uses. The Project site is divided into three Districts for planning purposes, as described below and depicted in Figure 2-5 of Chapter 2.0, Project Description, of the Draft EIR.

The planned character of each District is briefly described below.

1.1.1.1 LAX Northside Campus District

The LAX Northside Campus District is planned as a low-rise, low density office, and research and development park extending from Lincoln Boulevard west to Pershing Drive. Site access will be controlled, with project entry points planned as major design features along Westchester Parkway, incorporating graphic and landscape elements.

Along the north side of Westchester Parkway, buildings will be diverse in design character but will maintain a relationship to the street. Wider setbacks are required at major access points,

while smaller setbacks are required elsewhere to create a campus-like environment. These design strategies are intended to reinforce a pedestrian scale that integrates with the Westchester pedestrian paseo.

The proposed Project would permit up to 1,075,000 net square feet of new development in the LAX Northside Campus District, with the majority consisting of commercial and community and civic uses in Areas 2 and 3 and a small amount of new commercial development, up to 10,000 square feet, permitted in Area 1. Please see Figure 2-5 Figure 2-5 of Chapter 2.0, Project Description, of the Draft EIR for an overview of designated Areas associated with the proposed Project.

The proposed grading concept and building height limits will minimize the visual presence of new developments from the residential neighborhoods to the north. In Areas 2 and 3, grading strategies will bring building elevations down in height to orient the buildings to Westchester Parkway, while in Area 1 existing grading will be preserved to separate the potential open space uses planned in these areas from Westchester Parkway.

Landscape buffers are required in two separate locations in the LAX Northside Campus District- a 100-foot wide fenced and secured buffer area along the northern edge of Area 2 and a 20-foot buffer along the northern edge of Area 1. Buildings, parking, and pedestrian access are prohibited in these buffer areas.

1.1.1.2 LAX Northside Center District

The LAX Northside Center District is planned as a low to mid-rise, retail and office environment extending from Sepulveda Westway to Lincoln Boulevard. Vehicular access will be allowed primarily off of Westchester Parkway, with secondary access allowed along La Tijera Boulevard and Sepulveda Westway.

Building stepbacks and setbacks along Westchester Parkway and La Tijera Boulevard are planned to create a pedestrian environment that works with the proposed paseo and consolidates pedestrian activity along primary building frontages.

A maximum amount of 645,000 net square feet of new development would be permitted in the LAX Northside Campus District, consisting of up to 470,000 square feet of commercial development in Areas 11 and 12A East and 175,000 square feet of new community and civic uses in Areas 12A West and 13.

1.1.1.3 LAX Airport Support District

The areas south of Westchester Parkway will be comprised of low-rise, light industrial structures. The existing site entrance and security checkpoint at the intersection of Falmouth Avenue and Westchester Parkway will be maintained, allowing a secured access point for employees. The topography of this District, including existing landscape berms will be preserved to limit the visibility of new buildings and activities from Westchester Parkway and the new development planned in the Northside Campus District.

Up to 600,000 net square feet of new development would be permitted in Areas 4-10 in the Airport Support District, with the majority of building density being allocated to Area 4.

The proposed Project as presented in the Draft EIR was not changed, however additional Project Design Features (PDF AQ-4, PDF AQ-5, PDF AQ-6, PDF AQ-7, PDF AQ-8, PDF AQ-9,

PDF B-18, PDF GHG-4, PDF GHG-5, PDF GHG-6, PDF T-15, PDF T-16, PDF T-17, PDF T-18) have been added as described below. The basic function and purpose of the proposed Project have not changed, nor has the scope of the EIR analysis that was identified in the IS/NOP.

1.1.2 Final EIR

In accordance with CEQA Guidelines §15088, LAWA prepared responses to all comments received on the Draft EIR. As required by the CEQA Guidelines, the focus of the responses to comments is on "the disposition of significant environmental issues raised." Detailed responses are not provided to comments on the merits of the proposed Project or on other topics that do not relate to environmental issues.

This document, which is the second component of the Final EIR, presents the comments received during the public review period for the Draft EIR and provides written responses to those comments. A total of 39 comment letters were received during the public review period including written comments submitted at the public workshop on June 11, 2014. The indices presented in Chapter 2 of this document list the agencies, organizations, and individuals that submitted comments on the Draft EIR. Copies of all comment letters received are provided in Appendix A of this document. Chapter 2 of this document also presents individual responses prepared by LAWA relative to comments received during the review period for the Draft EIR. Chapter 3 of this document provides corrections and additions to information presented in the Draft EIR.

As explained in more detail in Chapter 2 of the Final EIR, subsequent to circulation of the Draft EIR, LAWA has voluntarily chosen to adopt 16 additional Project Design Features (PDFs) to address community concerns. These PDFs are not triggered or warranted by any significant impacts of the Project (i.e., are not mitigation measures), but will be made requirements as part of the proposed Project and will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program (included as Exhibit C of this Final EIR) as a means to confirm they have been included in the proposed Project.

Following are the PDFs added to the proposed Project:

- **PDF AQ-4:** Provide a minimum number of electric vehicle charging stations, which is equal to 5% of the total number of parking spaces.
- **PDF AQ-5**: Provide necessary infrastructure (wiring and plugs) at appropriate locations on the proposed Project site that can be used for electric landscaping equipment.
- **PDF AQ-6:** Watering three times daily to reduce fugitive dust emissions.
- **PDF AQ-7:** On-road trucks used on LAX construction projects with a gross vehicle weight rating of at least 19,500 pounds shall, at a minimum, comply with USEPA 2010 on-road emission standards for Particulate Matter less than 10 microns in diameter (PM_{10}) and Oxides of nitrogen (NO_x)[1]. Contractor requirements to utilize such on-road haul trucks or the next cleanest vehicle available will be subject to the provisions of LAWA Air Quality Control Measure 2"x" (part of LAX Master Plan Commitment LAX-AQ-2, LAX Master Plan – Mitigation Plan for Air Quality; Construction-Related Measures).

[1] While the mitigation measure commits to using trucks that meet the USEPA 2010 standards for on-road heavy-duty trucks, the analysis conservatively assumes the use of trucks that meet the 2007 standards for on-road heavy-duty trucks.

- **PDF AQ-8:** All off-road diesel-powered construction equipment greater than 50 horsepower shall meet, at a minimum, US EPA Tier 3 off-road emission standards. In addition, all off-road diesel powered construction equipment greater than 50 hp with engines meeting USEPA Tier 3 off-road emission standards shall be retrofitted with a CARB-verified Level 3 Diesel Emissions Control Strategies (DECS). Any emissions control device used by the Contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. Wherever feasible, all off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards. In the event the Contractor is using off-road diesel-powered construction equipment with engines meeting the Tier 4 off-road emission standards and is already supplied with a factory-equipped diesels particulate filter, no retrofitting with DECS is required. Contractor requirements to utilize Tier 3 equipment or next cleanest equipment available will be subject to the provisions of LAWA Air Quality Control Measure 2"x" (part of LAX Master Plan Commitment LAX-AQ-2, LAX Master Plan – Mitigation Plan for Air Quality; Construction-Related Measures). LAWA will encourage construction contractors to apply for SCAQMD "SOON" funds to accelerate clean-up of off-road diesel engine emissions.
- **PDF AQ-9**: LAWA will provide informational materials to developers regarding building materials that do not require painting.
- **PDF B-18:** The proposed Project contractor shall utilize integrated pest/rodent management measures wherever feasible during construction in the LAX Northside Campus District, including efforts such as using pest-resistant or well-adapted native plant varieties; removing weeds by hand and avoiding the use of chemical pesticides, herbicides, and fertilizers; and maintaining the construction site free of unsealed food or open trash that could attract rodents.
- **PDF GHG-4:** Provide a minimum number of electric vehicle charging stations, which is equal to 5% of the total number of parking spaces.
- **PDF GHG-5:** Provide necessary infrastructure (wiring and plugs) at appropriate locations on the proposed Project site that can be used for electric landscaping equipment.
- **PDF GHG-6:** All off-road diesel-powered construction equipment greater than 50 horsepower shall meet, at a minimum, US EPA Tier 3 off-road emission standards. In addition, all off-road diesel powered construction equipment greater than 50 hp with engines meeting USEPA Tier 3 off-road emission standards shall be retrofitted with a CARB-verified Level 3 Diesel Emissions Control Strategies (DECS). Any emissions control device used by the Contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. Wherever feasible, all off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards. In the event the Contractor is using off-road diesel-powered construction equipment with engines meeting the Tier 4 off-road emission standards and is already supplied with a factory-equipped diesels particulate filter, no retrofitting with DECS is required. Contractor requirements to utilize Tier 3 equipment or next cleanest equipment available will be subject to the provisions of LAWA Air Quality Control Measure 2"x" (part of LAX Master Plan Commitment LAX-AQ-2, LAX Master Plan – Mitigation Plan for Air Quality; Construction-Related Measures). LAWA will encourage construction contractors to apply for SCAQMD "SOON" funds to accelerate clean-up of off-road diesel engine emissions.

- **PDF T-15:** Once 50% of Area 11 and Area 12 are occupied on a square foot basis, LAWA will conduct a parking study to evaluate potential parking impacts of the proposed Project. Should significant parking impacts be found at that time, LAWA will mitigate them to a level less than significant.
- **PDF T-16:** The Project would require the installation of a crosswalk across Loyola Boulevard at 91st Street or a roundabout at the intersection of Loyola Boulevard and La Tijera Boulevard if a land use is put into the Project side of the street that requires or encourages pedestrians to cross from the Project Site to the other side of Loyola Boulevard.
- **PDF T-17:** When 50% of the Project is built on the basis of afternoon peak hour trip generation, the Project will form a Transportation Management Organization (TMO) which qualifying Project businesses would be required to join and other area businesses and residences would have the option to join. The TMO would take over the implementation, operation, and expansion of the TDM program and could seek to implement transportation improvements too large for individual businesses to implement.
- **PDF T-18:** The Applicant would work with Metro and LADOT during Project design to identify a suitable location on the Project site which will be dedicated for potential future development of a transit station. Prior to any development on the Project site, LAWA would work with Metro and LADOT to identify a suitable location for a potential transit station. That land would be preserved for that use by LAWA for a period of up to 10 years, after which, should Metro determine that it does not need to develop a transit station at that location, the site would become available for Project development.
- **PDF T-19:** The Project Applicant will notify any affected transit operators at least one week in advance any time that construction activities will hinder normal operation of a regularly scheduled transit route. Activities warranting notification could include closure of a sidewalk in the vicinity of a transit stop, closure of a bus stop, lane closures, road closures, and heavy truck activity along a transit route.
- **PDF T-20:** Upon completion of 55% of Project development, or 1,400 afternoon peak hour trips, the Project would complete or have completed the following improvement to Intersection #86, Sepulveda Boulevard & Jefferson Boulevard & Playa Street: Add a third eastbound left-turn lane, along with associated signage and traffic signal improvements. After implementation of the improvement, this intersection would provide two left-turn lanes, one shared left-turn/through lane, and one shared through/right-turn lane in the eastbound direction.

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2 Comments and Responses

2.1 Introduction

In accordance with Section 15088 of the State CEQA Guidelines, LAWA prepared responses to all comments received on the LAX Northside Plan Update Draft Environmental Impact Report (EIR). As required by the State CEQA Guidelines, the focus of the responses to comments is on "the disposition of significant environmental issues raised." Detailed responses are not provided to comments on the merits of the LAX Northside Plan Update or on other topics that do not relate to environmental issues

This chapter of the LAX Northside Plan Update Final EIR presents LAWA's written responses to comments received on the LAX Northside Plan Update Draft EIR. The format for the responses to comments presents, on a letter-by- letter basis, each comment, which is then followed immediately by a response. The comments and responses are organized and grouped into categories based on the affiliation of the commenter. The comments are presented in the following order: state agencies, regional agencies, local agencies, and public comments (i.e., letters from private citizens, organizations, etc.). An alphanumeric index system is used to identify each comment and response, and is keyed to each letter and the individual comments therein. For example, the first letter within the group of state agencies submitting comments on the LAX Northside Plan Update Draft EIR is from the California State Clearinghouse, and the text of the letter is considered to have one individual comment. The subject letter was assigned the alphanumeric label "LAXN-AS01," representing "LAX Northside Plan Update- Agency-State-Letter No. 1." The individual comment within the letter is labeled as LAXN-AS01-1. The same basic format and approach is used for the comment letters from regional agencies ("AR"), local agencies ("AL"), and public comments ("PC").

The following are the prefix codes used for categorizing the comment letter types:

Letter ID Prefix	Description
AS	State Agency
AR	Regional Agency
AL	Local Agency
PC	Public Comment

To assist the reader's review and use of the responses to comments, an index of comment letters is provided. This index provides the alphanumeric label number, commenter name, affiliation (i.e., name of agency or organization that the author represents), and date (if provided) of each comment letter. It lists all of the comment letters by alphanumeric label number.

This chapter provides individual comments and responses, presented on a letter-by-letter basis. Each comment is typed exactly as it appears in the original comment letter. No corrections to typographical errors or other edits to the original comments were made. Some comment letters include attachments. A copy of each original comment letter and any related attachments is provided in Appendix A of this Final EIR. Immediately following each typed comment is a written response. In many instances, the response to a particular comment may refer to the response(s) to another comment(s) that expressed the same concern or is otherwise related. Cross-referencing of responses uses the alphanumeric index system described above. For

example, a response may indicate "Please see Response to Comment LAXN-PC01-1" if that response addresses the same concern expressed in a different comment.

2.2 Index of Comment Letters

Following is an index that organizes the comment letters by letter identification number.

Index by Comment Letter ID

Letter ID	Commenter	Affiliation/Agency/Department	Date
LAXN-AS01	Scott Morgan	State Clearinghouse	7/1/2014
LAXN-AS02	Dianna Watson	Caltrans	8/18/14
LAXN-AR01	Martha Welborne	Metro	5/27/2014
LAXN-AR02	Marie Sullivan	Metro	7/17/2014
LAXN-AR03	Ed Eckerle	South Coast Air Quality Management District	7/25/2014
LAXN-AL01	Ali Poosti	Bureau of Sanitation	6/11/2014
LAXN-AL02	Donald R. Duckworth	Westchester Town Center Business Improvement District	6/11/2014
LAXN-AL03	Donald R. Duckworth	Westchester Town Center Business Improvement District	6/19/2014
LAXN-AL04	Christina V. Davis	LAX Coastal Chamber of Commerce	7/17/2014
LAXN-AL05	Jeff Jacobberger	Bicycle Advisory Committee of the City of Los Angeles	7/20/2014
LAXN-AL06	Cyndi Hench	Neighborhood Council of Westchester Playa	7/21/2014
LAXN-AL07	Barbara Lichman	Culver City	7/25/2014
LAXN-PC01	Edwart G. Keating	None Provided	5/20/2014
LAXN-PC02	Iggy Tester	None Provided	5/21/2014
LAXN-PC03	Douglas C. Arseneault	Valley Industry and Commerce Association	5/27/2014
LAXN-PC04	Patricia Smith	None Provided	6/8/2014
LAXN-PC05	Grace Yao	Loyola Marymount University	6/11/2014
LAXN-PC06	Mo Sadrpour	None Provided	6/11/2014
LAXN-PC07	Nancy Gene W. Morrison	None Provided	6/11/2014
LAXN-PC08	Susan Barrett	Buchalter Nemer	6/12/2014
LAXN-PC09	Erin Wallace	None Provided	6/17/2014
LAXN-PC10	Nathanael Nerode	None Provided	6/17/2014
LAXN-PC11	Linda Ching-Ikiri	None Provided	6/20/2014
LAXN-PC12	Gregg Aniolek	None Provided	6/23/2014
LAXN-PC13	Bryce Sheldon	Integrated Services Corp	6/25/2014
LAXN-PC14	Ashley Wingate	Complete Signs	7/10/2014
LAXN-PC15	Dawn Goodwin	None Provided	7/16/2014

Index by Comment Letter ID

Letter ID	Commenter	Affiliation/Agency/Department	Date
LAXN-PC16	Keri Mallozzi	SpotOn Networks	7/16/2014
LAXN-PC17	Allen Offinitz	None Provided	7/17/2014
LAXN-PC18	Janet Okawa	None Provided	7/17/2014
LAXN-PC19	Mo and Bonnie Sadrpour	91st Street Neighborhood	7/17/2014
LAXN-PC20	Richard J. Sauschuck	None Provided	7/19/2014
LAXN-PC21	Danna Cope	None Provided	7/20/2014
LAXN-PC22	Dr. Cynthia Colon Hoepner	St. Bernard High School	7/21/2014
LAXN-PC23	Eion Faelten	None Provided	7/21/2014
LAXN-PC24	Garrett Smith	None Provided	7/21/2014
LAXN-PC25	Kent Strumpell	None Provided	7/21/2014
LAXN-PC26	Lore Pekrul	None Provided	7/21/2014
LAXN-PC27	Matthew Hetz	None Provided	7/21/2014

Source: URS, 2014.

2.3 Comments and Responses

The following provides the individual responses to comments on the LAX Northside Plan Update Draft EIR.

LAXN-AS01 **Scott Morgan** **State Clearinghouse** **7/1/2014**

LAXN-AS01-1

Comment:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on June 30, 2014 and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have questions about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. It is further noted that although the public review period was scheduled to close on June 30, 2014, LAWA extended the public review period to July 21, 2014 in response to community requests for additional time to review the Draft EIR. Finally, although no state agency comments were submitted by June 30, 2014 or July 21, 2014, LAWA met with Caltrans and accepted comments from them after the close of the public review period. This Final EIR includes responses to those comments (refer to response to comments for letter LAXN-AS02).

LAXN-AS02 **Dianna Watson** **Caltrans** **8/18/14**

LAXN-AS02-1

Comment:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed Project would set forth new regulations for future development occurring within the Northside area of the LAX Specific Plan, an area of approximately 340 acres north of LAX. The proposed Project is to develop up to 2,320,000 square feet of new development and is intended to create a vibrant sustainable center of employment, retail, restaurant, office, hotel, research and development, education, civic, airport support, recreation and buffer uses that support the need of surrounding communities and LAWA.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

LAXN-AS02-2

Comment:

We appreciate the opportunity to meet with the Lead Agency and the consultants on July 15, 2014. In that meeting, we understood that the Lead Agency would follow Caltrans suggested Guide for the Preparation of Traffic Impact Studies. Caltrans, as the State agency responsible for planning, operations, and maintenance of State highways, shares similar transportation goals with the Lead Agency. In the spirit of mutual and collaborative planning, we offer our expertise in the areas of transportation modeling, mainline freeway analysis, system and corridor planning, environmental and community impact assessment, as well as identifying critical operational deficiencies affecting freeway congestion, speed, and delay.

Response:

The comment expresses appreciation for the cooperation LAWA has shown in addressing Caltrans' concerns. As requested, Caltrans' Guide for the Preparation of Traffic Impact Studies was followed for analysis of State highway facilities. No further response is required.

LAXN-AS02-3

Comment:

The Project Trip Percentages at Caltrans Facilities submitted to Caltrans on July 30, 2014 was low according to Caltrans modeling office experience. The select link calculations may assume that, though consultant does not show it, the conditions on the Freeway system are extremely congested that it diverts trips to the arterial system. The SCAG model shows congestion on the arterial system (particularly Sepulveda and Lincoln) is extremely heavy, and thus the proportion diverted to the arterial system (i.e. 7% on I-405 North of SR-90 versus 23%) underestimates the use of the freeway system by trips originating in the study area. Perhaps, model assumptions need to be calibrated.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. The SCAG model is the region's official adopted travel demand forecasting model, used by nearly all local jurisdictions (including the City of Los Angeles, the lead agency for the Project, and by Caltrans) to predict traffic flows with future land uses or infrastructure changes. It has been developed, tested, refined, and updated with input from nearly every city and county within the coverage area. It was used as the base for the City of Los Angeles travel demand forecasting model, which was then further refined to produce the LAX Traffic Model, that informed the Project's traffic distribution. Since the Project's distribution was developed using the established and adopted tools for the area, it is consistent with regional planning assumptions and does not need to be modified.

As suggested in the Comment, the model does assign traffic based on a minimum time path algorithm and therefore the assignment of trips along the freeway system or the arterial street system does indeed reflect the level of congestion predicted to occur along a trip's alternate routes to/from their destinations. Thus the model does not "underassign" trips to one segment of the roadway system (freeway vs. arterial), but rather assigns trips to the system based on the travel times that result from the predicted future levels of congestion. If the assignment of proposed Project trips seems low on a particular freeway segment, it is because the arterial street system offered a better (i.e., faster) alternate for proposed Project trips headed in that direction.

The directional assignment of proposed Project trips was reviewed and approved by the Los Angeles Department of Transportation and no comments regarding the assignment of trips were received from SCAG.

LAXN-AS02-4

Comment:

The 2035 plan horizon year projection needs to be more conservative. The SCAG 2012 Regional Transportation Plan Model shows the I-405, particularly on the southbound side in 2035, operating at LOS F0 or worse. The northbound side during the same time period is also operating at LOS F0 or worse for a good portion of the segments north of I-105.

Response:

The year 2035 analysis included traffic growth both from the LAX Traffic Model and the Los Angeles County Congestion Management Program (CMP). Total growth on the freeway segments during the peak hours was projected at 14.18%. This estimate is highly conservative, as it includes both the total projected growth on the street system to year 2022 from the intersection peak hour analysis (based on the LAX Traffic Model) and the total CMP growth projection between year 2010 and 2035. The 25-year CMP growth projection for the South Bay/LAX area is only 5.30%, approximately one third of the growth assumed in the 2035 Caltrans analysis. Further, as shown in Table E-4 of the traffic study (Transportation Study for the LAX Northside Plan Update, Gibson Transportation Consulting, Inc., May 2014, provided as Appendix E to the Draft Environmental Impact Report), under Future without Project Conditions (Year 2035) a total of 6 of the 15 analyzed freeway segments on I-405 were projected to operate at LOS F(0) or worse during one or both peak hours in one or both directions. Therefore, the analysis shows proposed Project LOS F conditions at many of the segments on I-405, consistent with the conditions described in the comment.

However, in order to present a more conservative analysis at the request of the comment, a supplemental analysis of Year 2035 conditions has been prepared using higher growth assumptions (23% total, representing 1% growth per year between years 2012 and 2035). Because this analysis assumes higher background traffic growth, some freeway segments will be projected to operate at worse LOS than in the analysis presented in the traffic study. Also, based on the request in Comment LAXN-AS02-7, the Highway Capacity Manual (Transportation Research Board, 2010) (HCM) analysis methodology was used, which includes adjustments for heavy vehicles, peak hour factor, and others which serve to further worsen the operating condition projection.

The results of the supplemental Year 2035 freeway segment analysis are shown in Tables LAXN-AS02-1 for Future without Project conditions, LAXN-AS02-2 for Future with Project conditions, and LAXN-AS02-3 for Future with Project with Mitigation conditions. As shown in Table LAXN-AS02-2, under Future with Project conditions in this supplemental analysis, a total of 11 of the 15 analyzed freeway segments on I-405 were projected to operate at LOS F during one or both peak hours in one or both directions, compared with 6 of the 15 segments under the analysis in the traffic study as described above. Please see Appendix B of this Final EIR for additional traffic analysis tables. As stated above, the CMP growth projection for the region is only 5.30%, far less than the

23% assumed in this conservative analysis, and even far less than the 14.18% assumed in the traffic study analysis. Therefore, the analysis provided in the traffic study is already appropriately conservative at assessing future freeway operating LOS. The supplemental analysis provided here does not reflect a realistic growth scenario, and is only provided due to the specific request of the comment. Please see Appendix B of this Final EIR for additional traffic analysis tables.

LAXN-AS02-5

Comment:

The proportion of trips using the freeway versus the arterial system underestimates utilization of the freeway system, and Lincoln Blvd North of Manchester Boulevard is at LOS E devolving to LOS F by the time it reaches Jefferson Boulevard. As a general rule N/S circulation within the area on both arterials and the freeways is heavily congested.

Response:

This comment is similar to Comment LAXN-AS02-3. Please see Response to Comment LAXN-AS02-3 for a detailed response regarding the use of the LAX Model to inform the distribution of Project traffic. The LAX Model distributes traffic in such a manner that projected travel times are balanced between various routes – in this case, such that Lincoln Boulevard and I-405 can move traffic north and south at approximately the same overall speed. Actual drivers – especially commuters, who are very familiar with traffic patterns along their route – do the same thing, and in light of that the model's output (and thus the trip distribution pattern) is justified. The intersection analysis in the Draft EIR does not support the comment's statement that Lincoln Boulevard operates at LOS E or F. Between Manchester Avenue and Jefferson Boulevard, as shown in Table 4.14-3 on pages 4.14-17 through 4.14-24 of the Draft EIR, Lincoln Boulevard currently operates at LOS A or B, in large part because of the minimal amount of cross traffic at the study intersections along that corridor. North of Jefferson Boulevard, Lincoln Boulevard generally operates at LOS A, B, or C, though the intersections at Washington Boulevard and Venice Boulevard operate at LOS E during the afternoon peak hour. The Draft EIR identified significant traffic impacts due to Project traffic (prior to mitigation) at five intersections along this stretch of Lincoln Boulevard, including at Manchester Avenue, Jefferson Boulevard, Fiji Way, Mindanao Way, and Venice Boulevard. After mitigation, one significant impact would remain along this corridor, at the intersection of Lincoln Boulevard & Jefferson Boulevard.

LAXN-AS02-6

Comment:

In the Appendix E, Caltrans Analysis from the Traffic Study prepare in May 2014, many of the freeway segments show Level of Service (LOS) C and D in 2012 (Table E-2). However, when Caltrans verified the 2014 traffic data from PeMS, many of the freeway segments are operating at LOS E. We would like to bring this to your attention that the report may need to use the most recent traffic data to reflect the accuracy of the report according to CEQA.

Response:

The comment states that year 2014 conditions on the freeway system are worse than year 2012 conditions, and should be reflected in the traffic study. However, the Project's Notice of Preparation (NOP) was filed on April 4, 2012. Under California Environmental Quality Act (CEQA) guidelines, a Project's existing conditions analysis is tied to the existing conditions at the time of filing the NOP in order that the analysis doesn't have to continue chasing a moving target with regard to current conditions. The freeway segment data used in the year 2012 analysis was April 2012 data from PeMS, which is provided by Caltrans. It is appropriate to use data from 2012 for the existing conditions analysis for CEQA purposes. Additionally, more recent data from PeMS was reviewed for comparison to the April 2012 data used in the Draft EIR. The most recently available data was from September, 2013, and data was not available for many of the analyzed segments, and therefore no complete direct comparison could be made. In general, the volumes were

slightly higher in September 2013 than in April 2012, though not so much as to affect the LOS results. The future year analyses provided, including years 2022 and 2035, provide more conservative conditions reflective of the time when the Project can be expected to be built out.

LAXN-AS02-7

Comment:

Even when using the 2012 traffic data (V/C) in Table E-2 with the congested freeway calculating at LOS C or D and causing the freeway operating at unstable condition, Caltrans suggests the Lead Agency to use the speed or other measurement to calculate LOS other than V/C. Nevertheless, the end result in LOS must match the reality in order to obtain accurate data for the public to review.

Response:

The V/C analysis of freeway segments presented in the Draft EIR was appropriate for assessing freeway operating conditions and was conducted using a methodology consistent with freeway segment analyses for many other projects in Caltrans District 7. However, at the comment's request, a supplemental freeway segment analysis was conducted using the Highway Capacity Manual (Transportation Research Board, 2010) (HCM) analysis methodology, which calculates speed and density of the traffic flow at a segment to assess LOS. The HCM methodology also includes adjustments for heavy vehicles, peak hour factor, and others. Additionally, this analysis excludes any capacity credit assumption for high-occupancy vehicle (carpool) lanes or auxiliary lanes. The HCM analysis reports vehicle speeds and density (measured in passenger cars per mile per lane (pc/mi/ln)) and the associated LOS. The analysis was conducted for Existing year 2012 conditions, Future year 2022 conditions, and Future year 2035 conditions. The Future year 2035 conditions analysis, which also included additional traffic growth at the request of Comment LAXN-AS02-4, is provided and discussed in detail in Response to Comment LAXN-AS02-4.

The Existing conditions (year 2012) analysis is presented in Table LAXN-AS02-4. The Existing with Project conditions and Existing with Project with Mitigation conditions are shown in Tables LAXN-AS02-5 and LAXN-AS02-6, respectively. Please see Appendix B of this Final EIR for additional traffic analysis tables. As shown in Table LAXN-AS02-4, the supplemental analysis of year 2012 freeway operating conditions shows that a total of 5 freeway segments operated at LOS F in one or both directions during the morning peak hour and 3 freeway segments operated at LOS F in one or both directions during the afternoon peak hour. By comparison, the analysis presented in the Draft EIR demonstrated that a total of 3 freeway segments operated at LOS F in one or both directions during the morning peak hour and 2 freeway segments operated at LOS F in one or both directions during the afternoon peak hour in year 2012. Please see Appendix B of this Final EIR for additional traffic analysis tables.

The Future without Project conditions (year 2022) analysis is presented in Table LAXN-AS02-7. The Future with Project conditions and Future with Project with Mitigation conditions are shown in Tables LAXN-AS02-8 and LAXN-AS02-9, respectively. Please see Appendix B of this Final EIR for additional traffic analysis tables. As shown in Table LAXN-AS02-7, the supplemental analysis of year 2022 freeway operating conditions shows that a total of 7 freeway segments would operate at LOS F in one or both directions during the morning peak hour and 5 freeway segments would operate at LOS F in one or both directions during the afternoon peak hour. By comparison, the analysis presented in the Draft EIR demonstrated that a total of 6 freeway segments operated at LOS F in one or both directions during the morning peak hour and 4 freeway segments operated at LOS F in one or both directions during the afternoon peak hour in year 2022. Please see Appendix B of this Final EIR for additional traffic analysis tables.

As stated in Section 4.14.3.2.4 of the Draft EIR, the *Caltrans Guide for the Preparation of*

Traffic Impact Studies (Caltrans, December 2002) does not identify specific incremental criteria for use in determining the significance of impacts on freeway segments. Further, the Congestion Management Program (CMP) criteria used to assess significant impacts in the Draft EIR is not applicable to the HCM methodology, which does not calculate V/C ratio. The results of the supplemental analyses above provide additional information for Caltrans and the public, but do not identify any new significant impact on Caltrans freeway segments.

LAXN-AS02-8

Comment:

For Table E-15 Off-Ramp Evaluation, capacity of the off-ramp should be calculated by the actual length of the off-ramp between the terminuses to the gore point with 30 feet per car. The demand of the off-ramp should be calculated from the traffic counts, actual signal timing, % of truck assignment on the ramp with passenger car equivalent factor of 3.0, generally speaking. The capacity and demand provided in the table needs to be conservative and referenced. Typically a queuing analysis of the off-ramps in the project vicinity should utilize the Highway Capacity Manual (HCM) 85th percentile queuing methodology with the actual signal timing at the ramps' termini. Many of the existing off-ramps are over capacity. Caltrans would like to continue working with the lead agency to properly provide accurate queuing analysis for the off-ramps.

Response:

The Draft EIR contains a thorough and accurate analysis of off-ramp capacity as requested by the comment. The analysis used HCM 85th percentile queuing and actual traffic counts, as the comment directly requests. The analysis assumed 25 feet per vehicle, which is a reasonable and commonly-applied vehicle length in queuing analyses, though the comment suggested use of 30 feet per vehicle. Trucks make up a very small percentage of traffic on the three freeways at which off-ramps were studied (approximately 3%, on average, based on data published by Caltrans), and therefore no adjustment was made for truck traffic in the analysis presented in the Draft EIR. The traffic signals at the off-ramps use computer control to optimize signal timing in response to traffic conditions, and the analysis software simulates optimized conditions as well. Therefore, the analysis presented in the Draft EIR was reasonable and valid.

However, at the request of the comment, a supplemental analysis of freeway off-ramp capacity was conducted with the additional considerations described in the comment. Please see Appendix B of this Final EIR for additional traffic analysis tables. The supplemental analysis accounts for three things requested in the comment: (1) ramp lengths were reported in feet as well as in car-lengths; (2) ramp lengths were converted to car lengths assuming 30 feet per car instead of 25 feet per car, resulting in lower queue length capacities at all ramps; (3) all reported queue lengths from the HCM 85th percentile calculation were increased by 6% to account for truck traffic, based on Caltrans data showing that approximately 3% of vehicles on these freeways are trucks and the comment's suggested passenger car equivalency (PCE) factor of 3.0 for trucks. As shown in Table LAXN-AS02-10, the supplemental analysis still shows that none of the ramps would have queues onto the mainline freeway segments. Please see Appendix B of this Final EIR for additional traffic analysis tables. The Project would result in modest increases to the number of cars queued on several of the ramps, but would not cause those ramps to exceed the available queuing capacity, and therefore the Project would have a less-than-significant impact with respect to off-ramp capacity.

LAXN-AS02-9

Comment:

For Fair Share Calculations submitted on July 30, 2014, the existing freeway LOS should be used rather than 2035 freeway LOS. The freeway segments that are not be able to maintain the existing Measures of Effectiveness (MOE) with the project traffic trips will be determined impacted.

Response:

As referenced in the comment, a fair-share calculation table was provided to Caltrans on July 30, 2014 (after release of the Draft EIR), which estimated the Project's share of the total anticipated traffic growth between years 2012 and 2035 on certain freeway segments. Those segments were chosen at which two criteria were met: 1) the Project would add 50 or more peak hour trip in a single direction, and 2) the segment was projected to operate at LOS E or F in the year 2035. The fair-share calculation calculates the Project's percentage of the total growth anticipated between year 2012 and year 2035. However, the fair-share calculation is not a requirement of the California Environmental Quality Act (CEQA), and need not be discussed in this EIR. Ultimately, the provision of a fair-share contribution by the Project will depend on identification of suitable improvements to the freeways affected by the Project. LAWA will continue working with Caltrans discuss the fair-share contribution.

LAXN-AS02-10

Comment:

Caltrans would like to working [sic] with the Lead Agency to complete the traffic analysis and identify any feasible traffic mitigation on the State facilities. If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 140533NY/AL-DEIR.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. As has been discussed in Responses to Comments LAXN-AS02-2, through LAXN-AS02-9, the analysis provided in the Draft EIR was complete and adequate to represent the effects of Project traffic on the State highway system. The supplemental analyses shown in Tables LAXN-AS02-1 through LAXN-AS02-10 provide additional information for the decision makers based on specific analysis assumptions and methodologies requested by Caltrans in the comments above. The conclusions reached in the Draft EIR are unchanged, and no new mitigation to State highway facilities is required. As noted in Response to Comment LAXN-AS02-9, LAWA will continue working with Caltrans staff to discuss a fair-share contribution to a Caltrans facility improvement project. Please see Appendix B of this Final EIR for additional traffic analysis tables.

LAXN-AR01 **Martha Welborne** **Metro** **5/27/2014**

LAXN-AR01-1

Comment:

The Los Angeles County Metropolitan Transportation Authority (Metro) is a public agency that plans, constructs, operates, and funds transportation projects throughout Los Angeles County. Metro's plans and projects may be affected by proposed projects for which local jurisdictions are asked to issue a permit, license, certificate, or other entitlement for use. The purpose of this communication is to clarify the process by which we review proposed developments and policy documents for potential impacts on Metro's system and facilities, as well as the notifications we require in order to review relevant projects in a timely manner.

In fulfillment of its statutory obligations as the regional transit operator, regional transportation planning and programming agency, and Congestion Management Program Agency, Metro reviews and provides input on projects within Los Angeles County that may impact the region's mobility and transportation network, including potential impacts to Metro rights-of-way (ROWs), bus stops, transit facilities, station areas, and transit operations. We strive to encourage the safest possible conditions around our transit facilities, create synergies with surrounding developments, and support relevant plans and policies.

To ensure that Metro has sufficient time and meaningful opportunity to comment, per Public Resources Code §21003.1(a), please notify Metro of all proposed projects that may impact our facilities and services as early in the planning or entitlement process as possible. We request notification, as detailed in the attached matrix, at the time of preapplication consultation, as suggested in CEQA Guidelines section 15060.5(b), or as soon as is practicable. In addition, Metro should receive Notices of Preparation (NOPs) for all projects requiring Environmental Impact Reports (EIRs). In our experience, early consultation can resolve potential problems that could otherwise arise in more serious forms later in the review process.

As Metro works to improve mobility and quality of life in Los Angeles County, we look forward to working with local agencies to ensure the best possible development and policy outcomes. Together, we can encourage projects that will be complementary to and supportive of the growing transportation system.

Should you have any questions regarding this communication, please contact Nick Saponara at SaponaraN@metro.net / 213-922-4313 or Marie Sullivan at SullivanMa@metro.net / 213-922-5667.

ATTACHMENT: NOTIFICATION MATRIX

DEVELOPMENT		
Notification Required	**Environmental Impact Reports**	All Environmental Impact Reports at the Notice of Preparation stage*
	Mitigated Negative Declarations, Negative Declarations, Categorical Exemptions, and all other documents	Within 500 feet of Metro ROW**
		Immediately adjacent to Metro bus stops
Notification NOT Required	Conditional Uses to permit the sale of alcoholic beverages or Wireless Telecommunication Facilities	
	Renovation projects and Changes of Use permits with limited exterior impacts	
	Tenant Improvement projects interior to the building	
	Additions of less than 500 square feet	
PLANNING/POLICY DOCUMENTS		
Notification Required	Updates to General Plan Land Use, Housing or Circulation/Transportation Elements	
	Specific Plans, TOD Overlays, Design Overlays within 500 feet of Metro ROW*	
	Streetscape Plans for streets where Metro Bus or Rail operates	
	Bicycle or Active Transportation Plans	
PUBLIC WORKS PROJECTS		
Notification Required	Installation of bicycle lanes where Metro Bus or Rail is present	
	Utilities and other public works projects (e.g. water pipeline projects, utility relocations) that cross or are adjacent to Metro ROW*	
	Significant roadway improvements with alterations to roadway configurations (e.g. street widening, road diets) where Metro Bus or Rail operates	

* All development projects that require preparation of an Environmental Impact Report (EIR) shall be subject to the Congestion Management Program (CMP) Land Use Analysis

Program and must incorporate a CMP Transportation Impact Analysis (TIA) into the EIR. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County," Appendix D.
**For notification purposes, Metro ROW is defined as an existing or planned fixed-guideway system including Metro Rail, Metro fixed-guideway buses, and Metro-owned railroad ROW operated by Metrolink or freight companies or reserved for future service. Geographic data detailing our ROW is available for download at: http://developer.metro.net/introduction/metro-row/row-download/
Please send all documents to: Development Review
Los Angeles County Metropolitan Transportation Authority (Metro)
One Gateway Plaza—Mail Stop 99-23-4
Los Angeles, CA 90012-2952

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. It is further noted that a Notice of Preparation, dated April 4, 2012, was sent to Metro by certified mail and that a Notice of Completion and Availability of a Draft Environmental Impact Report, dated May 15, 2014, was sent to Metro via mail.

Furthermore, per Metro's guidance, Section 4.14 Traffic of the Draft EIR incorporates CMP Transportation Impact Analysis. The CMP Transportation Impact Analysis requirements include analysis of arterial monitoring intersections, freeway monitoring segments, and the public transit system. The intersection and freeway segments that meet initial screening criteria are considered to be impacted by Project traffic if that traffic results in an increase of 0.02 or more in volume-to-capacity (V/C) ratio of a facility operating at LOS F.

As described in Section 4.14.3.4.4 Regional Transportation System beginning on page 4.14-84, the Project would add 50 or more peak hour trips to a total of 10 arterial monitoring intersections identified in the CMP. Two of those intersections are projected to operate at LOS F during one or both peak hours, but Project traffic did not increase the V/C ratio of either intersection by 0.02 or more. Therefore the Project would not significantly impact either intersection.

Analysis was conducted on two freeway monitoring segments identified in the CMP where the Project was projected to add 150 or more peak hour trips. Neither segment would operate at LOS F during either peak hour in either direction, and therefore the Project would not significantly impact either segment.

Page 4.14-88 contains an analysis of the capacity of the public transit system under existing and future conditions, compared to the amount of transit trips the Project was expected to add to that system. The transit system is estimated to have residual capacity of 2,415 patrons during the morning peak hour and 2,492 patrons during the afternoon peak hour under existing conditions, and of 2,107 patrons during the morning peak hour and 2,175 patrons during the afternoon peak hour under future conditions. The Project is only anticipated to add 211 transit trips during the morning peak hour and 267 transit trips during the afternoon peak hour, and therefore would not cause transit ridership to exceed capacity. Therefore, the Project would not significantly impact the public transit system.

LAXN-AR02 **Marie Sullivan** **Metro** **7/17/14**

LAXN-AR02-1

Comment:

Thank you for the opportunity to comment on the proposed LAX Northside Plan. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (LACMTA) concerning issues that are germane to our agency's

statutory responsibility in relation to our facilities and services that may be affected by the proposed project.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

LAXN-AR02-2

Comment:

The Draft Environmental Impact Report (DEIR) suggests that intersection improvements would be made that would benefit Metro Bus Operations, and that two new buses would be provided for the Metro 115 bus line. The following comments relate to Metro Bus Operations, relative to the proposed project:

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. The Project will be built in phases over time and the mitigation program will be implemented in concert with the development program, as described on page 4.14-106 of the Draft EIR. The Metro buses are required when approximately 75% of the Project is complete (1,907 afternoon peak hour trips).

LAXN-AR02-3

Comment:

1. In addition to providing buses for Metro the development may need to consider providing funding for operations of Line 115 on Manchester Avenue west of Sepulveda Bl. The description of Line 115 on page K-1 describes 10 minute peak period headways on Manchester Avenue in the vicinity of the project site, but the actual peak period headway is 30 to 45 minutes (excluding a brief period in the 7 AM hour westbound). Presently only one-third of Line 115 trips operate west of Sepulveda Boulevard to Playa del Rey, so buses only operate every 30 to 60 minutes near the project site (buses that terminate at Sepulveda Boulevard are called “shortline” buses). Extending some of the shortline trips on Line 115 would appear to meet a common goal of Metro and LAWA to serve new riders, and could attract more project-generated trips. Without funding the extension of some of the Line 115 shortline trips, the assumption that Line 115 will carry 66 project-generated trips is problematic, since most Line 115 trips do not operate west of Sepulveda Boulevard.

Response:

The Project analysis already considered that the provision of additional buses for Metro Route 115 – which travels east and west on Manchester Avenue near the Project Site, and at its eastern terminus extends all the way to Norwalk – would have a limited effect on vehicular trips west of Lincoln Boulevard. However, in response to the comment, the analysis was revised to limit the effect to all intersections west of, and including, Sepulveda Boulevard. Also, in deference to the request in Comment LAXN-AL07-11, an additional analysis was prepared using a more conservative average vehicle occupancy (AVO) of 1.40 instead of the 1.20 AVO used in the traffic study, which reduced the total potential vehicular trip reduction to 29 vehicles per bus rather than 33. From Sepulveda Boulevard west, intersections were allowed a credit of 9 vehicles per hour per direction. East of Sepulveda Boulevard, intersections were allowed a credit of 29 vehicles per hour per direction. The analysis was conducted for the 12 study intersections along the Metro Route 115, shown in Figure 13 on page 172 of the traffic study. Table LAXN-AR02-1 shows the results of the revised analysis for Existing with Project with Mitigation (year 2012) conditions, and Table LAXN-AR02-2 shows the results of the revised analysis for Future with Project with Mitigation (year 2022) conditions. Please see Appendix B of this Final EIR for additional traffic analysis tables. As the tables show, no new residual significant impacts would occur at any of these intersections with the reduction in bus credit.

LAXN-AR02-4

Comment:

2. In Table 6 which is an inventory of existing transit service in the study area, please note that Line 42 no longer exists; it has been incorporated into Line 102 operating from the LAX City Bus Center to South Gate with different service levels than shown in the table. Additionally, Line 439 was cancelled when Metro Expo Line opened in 2012. Table 6 also lists three routes under the Municipal Area Express (MAX) that should be removed, since MAX is no longer providing service. Also the description of public transit lines (Section K) should be updated to reflect these changes.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. In response to the comment, Tables 6, 7, and 27 from the traffic study have been modified to reflect the changes. They are provided as Tables LAXN-AR02-3, LAXN-AR02-4, and LAXN-AR02-5, respectively. Please see Appendix B of this Final EIR for additional traffic analysis tables. With the removal of Line 42 from the list of transit lines serving the Project vicinity, the number of residual transit capacity in year 2012 has been reduced to 2,347 during the morning peak hour and 2,416 during the afternoon peak hour. The future transit capacity analysis in Table LAXN-AR02-5 shows residual transit capacity in year 2022 of 2,051 during the morning peak hour and 2,111 during the afternoon peak hour. Please see Appendix B of this Final EIR for additional traffic analysis tables. In both analysis years, this remains less than the projected number of person-trips the Project will add to the transit system, which is 211 during the morning peak hour and 267 during the afternoon peak hour, and therefore, consistent with the analysis in the Draft Environmental Impact Report, no significant transit capacity impact would occur.

LAXN-AR02-5

Comment:

3. Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may Impact Metro bus lines. (For closures that last more than six months, Metro's Stops and Zones Department will also need to be notified at 213-922-5063). Other municipal bus operators may also be impacted and should be included in construction outreach efforts.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. As part of the Project's construction traffic management plan, a notification procedure will be developed to ensure that affected transit operators are alerted in advance of activities that could affect their operations. In response to this comment LAWA is voluntarily committing to the following additional Project Design Feature:

- **PDF T-19:** The Project Applicant will notify any affected transit operators at least one week in advance any time that construction activities will hinder normal operation of a regularly scheduled transit route. Activities warranting notification could include closure of a sidewalk in the vicinity of a transit stop, closure of a bus stop, lane closures, road closures, and heavy truck activity along a transit route.

Please see Chapter 3.0 Corrections and Additions to the Draft EIR.

LAXN-AR02-6

Comment:

4. LACMTA encourages the installation of bus shelters, benches and other amenities that improve the transit rider experience. The City should consider requesting the installation of such amenities as part of the development of the site.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. As the Project is developed, it will include development of a transportation demand management (TDM) program and the eventual founding of an areawide transportation management organization (TMO) (see response to Comment LAXN-AL06-8 for more information on the TMO). The areawide TMO funded by participating local businesses, including those operating at the Project site, may serve as a catalyst for enhancing transit service in the area. Should new transit lines be implemented serving the Project site, the TMO would work with Metro to implement transit shelters at stops within the Project vicinity once ridership levels meet Metro's criteria for installing shelters.

LAXN-AR02-7

Comment:

5. Final design of bus stops and surrounding sidewalk area must be Americans with Disabilities Act (ADA) compliant and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development.

Response:

The Project's design, including pedestrian amenities, sidewalks, and bus stops, as applicable, will be compliant with Americans with Disabilities Act (ADA).

LAXN-AR02-8

Comment:

Beyond impacts to Metro facilities and operations, LACMTA must also notify the applicant of state requirements. We appreciate the careful analysis that was done in the Draft EIR, but must reiterate the requirements as a formality. A Transportation Impact Analysis (TIA), with roadway and transit components is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County", Appendix D (attached). The geographic area examined in the TIA must include the following at minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).
2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
3. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.
4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1- D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

Response:

Chapter 9 of the traffic study (*Transportation Study for the LAX Northside Plan Update*, Gibson Transportation Consulting, Inc., May, 2014, provided as Appendix E to the Draft Environmental Impact Report) provides a detailed analysis of arterial intersections, state highway segments, and transit capacity in accordance with the requirements of the CMP. A total of 17 arterial monitoring intersections were identified within or near to the Study Area, and 10 were analyzed in detail for meeting the threshold of 50 Project trips during a

peak hour. No significant traffic impacts were identified to arterial monitoring intersections. A total of 5 freeway monitoring segments were identified within the Study Area, and two were analyzed in detail for meeting the threshold of 150 Project trips in one direction during a peak hour. No significant impacts were identified to freeway monitoring locations. Transit capacity was also reviewed, along with the number of transit trips the Project is expected to generate during the peak hours. Comment LAXN-AR02-4 noted that there have been several changes to public transit routes since the transit impact analysis was conducted, and therefore that analysis was updated to reflect those changes in Response to Comment LAXN-AR02-4. The results of the transit impact analysis were unchanged – the Project would not result in a significant impact to transit capacity. For a full discussion of the results of this analysis, please refer to Response to Comment LAXN-AR02-4.

LAXN-AR02-9

Comment:

If you have any questions regarding this response, please contact Marie Sullivan at 213-922-5667 or by email at SullivanMa@metro.net. LACMTA looks forward to reviewing the Final EIR. Please send it to the following address:

LACMTA Development Review
One Gateway Plaza MS 99-23-4
Los Angeles, CA 90012-2952

Response:

The comment is noted. It is further noted that Ms. Sullivan has been added to the proposed Project notice mailing list and future public notices will be sent to her at the address provided.

LAXN-AR03 **Ed Eckerle** **South Coast Air Quality Management District** **7/25/2014**

LAXN-AR03-1
Comment:

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the Lead Agency and should be incorporated into the revised Draft Environmental Impact Report (EIR) or Final EIR as appropriate.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

LAXN-AR03-2
Comment:

Based on a review of the air quality analysis in the Draft EIR the SCAQMD staff is concerned that the potential health risk impacts from the proposed project are underestimated due to incorrect identification of receptors surrounding the project site. Also, the SCAQMD staff is concerned that the air dispersion modeling analysis used to identify the project's localized Nitrogen Dioxide (NO2) impacts does not clearly demonstrate consistency with EPA approved methodologies. Therefore, the SCAQMD Staff recommends that the Lead Agency revise the health risk assessment (HRA) and air dispersion modeling analysis to address these concerns. Further, the SCAQMD staff recommends that the lead agency provide additional mitigation measures to minimize the project's significant regional construction and operational air quality impacts pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines. Details regarding these comments are attached to this letter.

Response:

The comment is a summary of the detailed comments discussed in the comment letter. The Draft EIR analysis does not underestimate health risk impacts and the air dispersion modeling to evaluate NO_2 impacts follows EPA methodologies; therefore, no revisions are warranted. The proposed Project includes several air quality and greenhouse gas mitigation measures listed in Section 4.2.3.3 LAX Master Plan Commitments and Project Design Features (Draft EIR p. 4.2-29 to 4.2-36) and on Draft EIR Page 4.6-12 consistent with the Los Angeles World Airports Sustainability Plan. In response to the comment, additional feasible mitigation measures have been included to minimize further the Project's significant regional construction and operational air quality impacts as described under the responses to comments LAXN-AR03-10 and LAX AR03-11. The detailed responses regarding the concerns expressed in the comment letter are included below corresponding to the specific comments provided.

LAXN-AR03-3
Comment:

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. Per Public Resources Code Section 21092.5, LAWA shall provide a written proposed response to public agency comments at least 10 days prior to certifying the proposed Project's environmental impact report. As requested, written responses to all comments are provided below. Additionally, per SCAQMD's suggestion LAWA met with SCAQMD to address issues and questions on October 17, 2014 to discuss issues and questions raised by SCAQMD. Consistent with those discussions, LAWA has incorporated the feasible mitigation measures that were suggested by SCAQMD.

LAXN-AR03-4
Comment:

Health Risk Assessment

1. Based on the Excel file HRA Outputs.xls provided to the SCAQMD staff on a USB drive, the worker receptor with the highest carcinogenic health risk impact from operations, and construction and operation together is located at 369300 m, 3758000 m, Zone 11. However, based on Figure 6 of Appendix C of the Draft EIR and on Google Maps with imagery dated April 17, 2013, the property at this coordinate is an apartment complex. The carcinogenic health risk from the proposed project reported to this receptor is presented as 1.5 in one million in Table 4.2-12. The same table lists the carcinogenic health risk to the resident as 1.1 in one million. Since health risk estimates for workers are typically lower than residential receptors because of differences in exposure duration, it appears that the apartment complex should be presented as the residential maximum individual cancer risk (MICR). Carcinogenic health risk values for this receptor should be estimated using residential health risk factors (e.g., breathing rate and exposure values) and correct annual concentration adjustment factor (AFann) and compared to carcinogenic health risk from other residential receptors to ensure that the residential MICR is correctly reported in the Final EIR. See comment # 2 below for additional details.

Response:

The comment correctly identifies misclassification of a receptor in the Health Risk Assessment. The classification was based on the land use map from the City of Los Angeles Department of City Planning website, which may have been outdated or inaccurate in that location. The Draft EIR analysis classifies the grid receptors as residential or worker based on the land use map obtained from the City of Los Angeles

Planning Division website http://planning.lacity.org. Upon further review, the receptor identified by the SCAQMD should be classified as a residential location. If this receptor is classified as a residential receptor, the maximum individual residential cancer risk at this location is estimated to be 1.1 in one million, which is equal to the maximum individual residential cancer risk that was reported in Table 4.2-12 of the Draft EIR. The risk value did not substantively change because while the exposure duration increased, the 'AFAnn' variable decreased. Thus, the Draft EIR has reported the maximum cancer risk at a residential receptor, which is less than significant, and no substantive changes are required. The changes to the results are shown in underline/strikeout in the Final EIR. Please see Chapter 3.0 Corrections and Additions to the Draft EIR.
See also response to comment No. 5 below.

LAXN-AR03-5
Comment:

2. Table 19 in Appendix C of the Draft EIR shows that during construction an AFann factor of one (1) was used for residential and sensitive receptors and 4.20 for worker receptors. Based on the input files provided to SCAQMD staff on a USB drive (e.g., LAX Construction Vol XQ ALL METDATA.ami) variable emission factors were used to limit emissions to between 8:00 am and 4:00 pm, Monday through Saturday. Based on Table 2C of the SCAQMD Permit Application Package "L", Revised July 11, 2008, the AFann for a source operation eight hours per day, six days per week should be 3.5. Therefore, the operational carcinogenic health risk to residential and sensitive receptors is under estimated. The health risk from construction should be recalculated with an AFann of 3.5 for residential, sensitive and worker receptors in the Final EIR.

Response:

The comment has identified a concern regarding the variable 'AFann' in the Health Risk Assessment. As stated in the comment, the 'AFann' variable is defined in Table 2C of the SCAQMD Permit Application Package "L", Revised December 7, 2012 and could be 3.5 for "worker" receptors based on the assumed construction schedule. The Draft EIR conservatively assumes a value of 4.2 that corresponds to an operation of eight hours per day and five days a week (rather than six days per week) since it is possible that construction may only occur five days per week. Since the assumption of 4.2 is conservative, there is no change required to the Health Risk Assessment for worker receptors.

The comment incorrectly suggests that residential and sensitive receptors should use a value of 3.5 for the 'AFann' variable. In the documentation cited by SCQMD, the footnote to Table 2C of the SCAQMD Permit Application Package "L", Revised December 7, 2012, indicates that an "AFann value for residential/sensitive receptors is 1.0, which assumes exposure of 24 hours per day, 7 days per week." The HRA utilized an AFann of 1.0 for residential receptors pursuant to this SCAQMD document. As stated in the SCAQMD document, the 'AFann' variable is used to adjust the dispersion factors to an average for the off-site worker exposure period. For this HRA, the estimated concentration reflects the annual average 24 hour concentration based on the total construction emissions that may occur. Thus, it is appropriate to use a 'AFann' value of 1.0 since the modeling accurately reflects that concentration at a residential receptor. Therefore, the Draft EIR analysis has correctly evaluated the health risk at residential and sensitive receptors.

LAXN-AR03-6
Comment:

3. Health risk values (i.e, carcinogenic health risk, non carcinogenic hazard indices, AL01 cancer burden) were estimated within Access. Because no documentation was provided on the sources of tables and queries used were provided, verification of health risk values generated is very difficult and time consuming. The Final EIR and all future projects with analysis prepared with Access should include detailed documentation that identifies the source of data in tables (spreadsheets, output files, etc.), the units of variables (e.g.,

(ug/m3)/(1 g/s), lb/day, etc.) manipulation of data using queries, etc.

Response:

The comment has requested that additional information be included in the Final EIR, to explain the data provided in the Draft EIR, notably the electronic files that were requested by SCAQMD. A summary of the electronic files is included below. The data files were included in Appendix C of the Draft EIR.

- Construction Health Risk Impacts were calculated in Access database called "Risk Impacts_Construction.accdb" located in \5_HRA
  - Table "1a_tbl_EmissionRate_Annual" provides annual emission rates in (grams/second/source) for construction emission sources. This data was pulled from the excel file \1_Construction_Emissions\02_CalEEMod_Construction_PostProcessing\On Site_ConstructionEmissions_with WS.xlsx → tab: HRAEmiss(ACCESS)
  - Table "1b_tbl_EmissionRate_Hourly" provides hourly emission rates (grams/second/source) for construction emission sources. Data was pulled from \1_Construction_Emissions\02_CalEEMod_Construction_PostProcessing\On Site_ConstructionEmissions_with WS.xlsx → tab: HRAEmiss_Hr
  - Table "1c_tbl_Toxicity" lists the toxicity level for diesel components. View this table in "design view" for source description and units for each column.
  - Table "1d_tbl_Exposure" lists the variable values for each population type. View this table in "design view" for source description and units for each column.
  - Table "1e_tbl_Speciation" lists the speciation fraction for diesel components. View this table in "design view" for source description and units for each column.
  - Table "2a_tbl_AllReceptors" includes all modeled receptors. Receptors have been flagged to calculate maximum individual cancer risk (MICR), chronic hazard index (CHI), acute hazard index (AHI). Fenceline receptors are not used for MICR and CHI calculations. Sensitive receptors are also modeled as "worker" receptors.
  - Table "2b_tbl_XOQAnnual" contains volume source "Dispersion Factors" for an annual averaging time obtained from the AERMOD output files located in \2_Construction_AQ_Impacts\AERMOD_Files_ConstAQImpacts\Const_AERMOD_Run_All_MET_Data\Volume_Sources
  - Table "2c_tbl_XOQHourly" contains volume source "Dispersion Factors" for an averaging time of 1-hour obtained from the AERMOD output files located in \2_Construction_AQ_Impacts\AERMOD_Files_ConstAQImpacts\Const_AERMOD_Run_All_MET_Data\Volume_Sources
  - Queries "1a_qry_XOQAnnual" and Query "1b_qry_XOQHourly" link the receptors in Table "2a_tbl_AllReceptors" with their respective dispersion factors.
  - Query "2a_qry_Speciated_Annual" calculates the annual emission rates of toxic air contaminants (TAC). View this query in "design view" to see the formulae.
  - Query "2b_qry_ConcAnnual" calculates annual ambient air TAC concentration resulting from each source group for each year of construction by combining emission rates with annual dispersion factors. View this query in "design view" to see the formulae.
  - Query "2c_qry_AvgAnnualConc" calculates annual average ambient air TAC concentration resulting from each source group. View this query in "design view" to see the formulae.

  - Query “2d_qry_Speciated_Hourly” Calculated hourly emission rates of TAC. View this query in “design view” to see the formulae.
  - Query “2e_qry_ConcHourly” calculates hourly ambient air TAC concentration resulting for each source group by combining TAC emission rates with 1-hour dispersion factors. View this query in “design view” to see the formulae.
  - Queries “3a_qry_CancerByArea”, “3b_qry_ChronicByArea”, and “3c_qry_AcuteByArea” calculate maximum individual cancer risk (MICR), chronic hazard index (CHI) and acute hazard index (AHI) using SCAQMD Risk Assessment Procedures for Rules 1401 and 212. View these queries in “design view” to see the formulae.
    Queries “4a_qry_CancerResults”, “4b_qry_ChronicResults”, and “4c_qry_AcuteResults” estimate total impact at each receptor by summing up impacts of sources located in all the project areas. View these queries in “design view” to see the formulae.
- Operational Health Risk Impacts were calculated in Access database called “Risk Impacts_Operation.accdb” located in \5_HRA
  - Tables “1a_tbl_AnnualNG” and “1b_tbl_HourlyNG” shows annual / hourly emission rate (MMScf/year or MMscf/hr) for operational emission sources (from natural gas). This data was pulled from -- \\5_HRA\HRA_Operational Inputs.xlsx → tab: NG (Access).
  - Table “1c_tbl_Toxicity” lists the toxicity level for diesel components. View this table in “design view” for source description and units for each column.
  - Table “1d_tbl_Exposure” lists the variable values for each population type. View this table in “design view” for source description and units for each column.
  - Table “1e_tbl_EFs” lists the emission factors for natural gas components. View this table in “design view” for source description and units for each column.
  - Table “2a_tbl_AllReceptors” includes all modelled receptors for the proposed Project. Receptors have been flagged to calculate maximum individual cancer risk (MICR), chronic hazard index (CHI), acute hazard index (AHI). Fenceline receptors are not used for MICR and CHI calculations. Sensitive receptors are also modeled as “worker” receptors.
  - Table “2b_tbl_XOQAnnual” contains volume source “Dispersion Factors” for an annual averaging time obtained from the AERMOD output files located in \4_Operational_AQ_Impacts\AERMOD_Files_OperationAQImpacts\Operational_AERMOD_Run_All_MET_Data.
  - Table “2c_tbl_XOQHourly” contains volume source “Dispersion Factors” for 1-hour averaging time obtained from the AERMOD output files located in \4_Operational_AQ_Impacts\AERMOD_Files_OperationAQImpacts\Operational_AERMOD_Run_All_MET_Data
  - Queries “1a_qry_XOQAnnual” and “1b_qry_XOQHourly” link receptors in Table “2a_tbl_AllReceptors” with their respective dispersion factor table.
  - Query “2a_qry_AnnualEmiss” calculates annual emissions rates of TAC sources. View this query in “design view” to see the formulae.
  - Query “2b_qry_ConcAnnual” calculates annual ambient air TAC concentrations by combining annual emission rates and annual dispersion factors. View this query in “design view” to see the formulae.
  - Query “2c_qry_HourlyEmiss” calculates hourly TAC emission rates. View this query in “design view” to see the formulae.
  - Query “2d_qry_ConcHourly” calculates hourly ambient air TAC concentrations by combining hourly TAC emission rates and 1-hour dispersion factors. View this query in “design view” to see the formulae.
  - Queries “3a_qry_CancerByArea”, “3b_qry_ChronicByArea”, and “3c_qry_AcuteByArea” calculate maximum individual cancer risk (MICR),

chronic hazard index (CHI) and acute hazard index (AHI) using SCAQMD Risk Assessment Procedures for Rules 1401 and 212. View these query in "design view" to see the formulae.

- Queries "4a_qry_CancerResults", "4b_qry_ChronicResults", and "4c_qry_AcuteResults" estimate total impact at each receptor by summing up impacts of sources located in all the project areas. View these queries in "design view" to see the formulae.

HRA outputs are then calculated in Excel file called "\\5_HRA\HRA Outputs.xlsx".

LAXN-AR03-7
Comment:

4. Table 19 in Appendix C of the Draft EIR shows that during operation an AFann of 1.00 was used for residential and sensitive receptors exposed over a 24-hour period and 4.20 was used for workers exposed over a 24-hour period. Since all variable emission factors are one in the input files provided to SCAQMD staff on a USB drive (e.g., LAX Operational XQ ALL METDATA.ami), 1.0 should be used for all receptors (residential, sensitive and worker). Since using an AFann of 4.20 for operational workers is conservative, no change would be required to this EIR. This information is provided for correction in future projects by the Lead Agency.

Response:

The comment identifies an assumption regarding 'AFann' that is conservative and thus does not require any further changes. The comment does not raise a specific issue regarding the analysis that requires correction, and, therefore, no more specific response is required.

LAXN-AR03-8
Comment:

Evaluation of Health Risk Impacts from the Airport on the Proposed Project

5. The Lead Agency determined that a maximum acute non-cancer health hazard index (HI) of 3.0 identified in the LAX Specific Plan Amendment Study (SPAS) Final EIR would occur at the northern border of the project site (see page 4.2-45 of the Draft EIR). The aforementioned non-cancer HI of 3.0 is primarily a result of elevated acrolein emissions from aircraft activity within the SPAS project site. Therefore, it is likely that the acute non-cancer HI impacts from the LAX SPAS project combined with the proposed uses for the LAX Northside Plan would exceed 1.0 within the project site (i.e., within the Northside Plan Area). As a result, the Lead Agency should identify areas within the project boundary that would cumulatively exceed an acute non-cancer HI of 1.0 in the Final EIR. Also, health risk impacts to the proposed project site should also be updated with other data (e.g., TAC emitting facilities identified in Figure 9 of Appendix C of the Final EIR for the proposed project).

Response:

The comment has requested additional evaluations to assess potential cumulative impacts. The Draft EIR has disclosed the potential impact of the LAX Specific Plan Amendment Study (SPAS) on page 4.2-45 of the Draft EIR. SPAS is a separate and independent project from the proposed Project. Based on that disclosure, the SCAQMD's request has already been addressed in the Draft EIR, which is that with the LAWA Staff Recommended Alternative of SPAS, the LAX Northside area would experience an increase in acute non-cancer hazard index above 1.0. Therefore, no further analysis is required.

The comment also requests that health risk impacts to the Project site be updated with other data (e.g., Toxic Air Contaminant (TAC) emitting sources within ¼ mile of sensitive land uses on the proposed Project site identified in Figure 9 of Appendix C of the Draft

EIR for the proposed Project). The cumulative analysis in Section 4.2.4 of the Draft EIR follows SCAQMD guidance[1] on addressing cumulative impacts for CEQA. CEQA requires that an EIR "shall identify and focus on the significant environmental effects of the proposed project"[2] and does not require an EIR to assess the impacts of the existing environment. Furthermore, any health risk assessment of the unrelated projects identified in Figure 9 of Appendix C would be speculative given the uncertainty and lack of data for the emissions and source parameters for those sites. CEQA does not require the analysis of the existing environment on the Project, and therefore, no further analysis is appropriate for the purposes of CEQA.

LAXN-AR03-9
Comment:

Air Dispersion Modeling

6. Page 15 of Appendix C of the Draft EIR states that NO2 impacts were estimated using the ambient ratio method with a NO2 to NOx conversion ratio of 0.08 for the 1- hr NO2 impacts and 0.75 for the annual NO2 impact. The AERMOD input files included on the USB drive provided to SCAQMD staff list the pollutant modeled as OTHER. As a result, it appears that NO2 emissions were estimated in post processing by multiplying NO to NO2 ambient concentrations using maximum 1- hour or annual concentrations generated by AERMOD. Therefore, the Final EIR should include detailed information on how concentrations were developed. The analysis in the Draft EIR was prepared using AERMOD v12060 dated 08/18/12, which included build-in NO to NO2 conversion routines. If NO2 concentrations were estimated using post-processed NO to NO2 conversion, the Final EIR should demonstrate that the method used was either consistent with EPA approved methodologies or generates NO2 concentrations that are as conservative as EPA methodologies.

Further, unitary emissions rates were modeled with AERMOD and pollutant concentrations were estimated by post processing (i.e., multiplying the resultant concentrations by the actual emission rates) using Access. No documentation on the origins of information in tables or on the queries used to complete the post processing was included. Verification of concentrations generated without documentation is very difficult and time consuming. The Final EIR and all future projects with analysis prepared with Access should include detailed documentation that identifies the source of data in tables (spreadsheets, output files, etc.), the units of variables (e.g., (ug/m3)/(1 g/s), lb/day, etc.) manipulation of data using queries, etc.

Response:

The comment discusses NO_2 modeling. NO_2 modeling was performed using the ambient ratio method which is consistent with the Tier 2 (2^{nd} level) screening analysis described in United States Environmental Protection Agency's (USEPA's) Modeling Guidance[3, 4]. The comment incorrectly states that a conversion ratio of 0.08 was used to estimate 1-hr NO_2 impacts. The NO_2 to NO_X conversion ratio used for estimating 1-hr NO_2 impacts was 0.80 (see footnote 4 in Table 4.2-10 in Draft EIR p. 4.2-40 and footnote 4 in Table 4.2-11 in Draft EIR p. 4.2-41) which is consistent with USEPA's Modeling Guidance for 1-hr NO_2 National Ambient Air Quality Standard[5]. Annual NO_2 impacts were estimated using the

[1] Available at: http://www.aqmd.gov/hb/2003/030929a.html. Accessed: March 2014.
[2] California Public Resources Code Sections 21080, 21082.2, 21100, 21151 or 14 CCR § 15126.2.
[3] USEPA, Memorandum on Additional Clarification Regarding Application of Appendix W Modeling Guidance for the I-hour NO_2,National Ambient Air Quality Standard, March 2011. Available at: http://www.epa.gov/region07/air/nsr/nsrmemos/appwno2_2.pdf. Accessed: February 2014.
[4] USEPA, 40 CFR Part 51 Appendix W, 2011. Available at: http://www.gpo.gov/fdsys/pkg/CFR-2011-title40-vol2/pdf/CFR-2011-title40-vol2-part51-appW.pdf. Accessed: February 2014.
[5] USEPA, Memorandum on Additional Clarification Regarding Application of Appendix W Modeling Guidance for the I-hour NO_2,National Ambient Air Quality Standard, March 2011. Available at: http://www.epa.gov/region07/air/nsr/nsrmemos/appwno2_2.pdf. Accessed: February 2014.

national default NO_2 to NO_X equilibrium ratio of 0.75 as recommended by USEPA's Guidelines on Air Quality Models[6]. Details of the air dispersion modeling methodology including post processing are described in Section 5.1 in Draft EIR Appendix C p.11 to p.15. The comment has requested additional information be included in the Final EIR to explain the data provided in the Draft EIR, notably the electronic files that were requested by SCAQMD. The contents of the electronic files can be found in the Draft EIR in Appendix C, which contains the air quality and GHG technical reports. An additional summary of the electronic files provided to AQMD is included below.

Construction Related Air Quality Electronic File Description

- Unitary emission rates were modelled using AERMOD for area and volume sources, and 2005 – 2007 MET data. AERMOD output files can be found in the folder \2_Construction_AQ_Impacts\AERMOD_Files_ConstAQImpacts.
- Using AERMOD output files, maximum dispersion rates for different average times (1 hour, 8 hour, 24 hour, and annual) are calculated in Access databases (Construction_1hr_DispFac.accdb, Construction_8hr_DispFac.accdb, Construction_24hr_DispFac.accdb, and Construction_Annual_DispFac.accdb) located in the folder 2_Construction_AQ_Impacts\AERMOD_PostProcessing_ConstAQImpacts.
- Ambient air quality impacts from construction are estimated using the following Access databases: CO_1hr_Construction.accdb, CO_8hr_Construction.accdb, NOx_1hr_Construction.accdb, NOx_Annual_Construction.accdb, PM10_24hr_Construction.accdb, PM10_Annual_Construction.accdb, and PM25_24hr_Construction.accdb.
- Description of tables and queries in the Access databases used to calculated ambient air quality impacts:
  - Table "0_tbl_EmissionRate" shows construction source emission rates. This data was pulled from the following Excel file: \1_Construction_Emissions\02_CalEEMod_Construction_PostProcessing\On Site_ConstructionEmissions_with WS.xlsx → tabs: Pollutant_Hour(ACCESS) or Pollutant_Annual(ACCESS).
  - Table "1_tbl_AllReceptors" includes all modeled receptors.
  - Table "2_tbl_DispersionFactor" is obtained from database information mentioned above. Use respective database for averaging time (1 hour, 8 hour, 24 hour, and Annual).
  - Query "1a_qry_Impact_Areawise" calculates the ambient air impact of sources in each project area for each scenario (maximum day in each area and overall project maximum day for short term impact and every year of construction for annual impacts) emission rates and dispersion factors. View this query in "design view" to see the formulae. Note, the PM databases have a query 2a that performs the same calculation for fugitive PM.
  - Query "1b_qry_Impact_Project" calculates the total ambient air quality impact of the proposed Project for each scenario by summing up the impacts of all project areas. View this query in "design view" to see the formulae. View this query in "design view" to see the formulae. Note, the PM databases have a query 2b that performs the same calculation for fugitive PM.
  - Query "1c_qry_Impact_Summary" links the total ambient air quality impact at each receptor for each scenario to the receptor table. View this query in "design view" to see the formulae. Note, in the PM database we have a Query "3_qry_Impact_Summary" which performs the same function. This Query 3 also sums up impacts of exhaust and fugitive portions of the PM.

[6] USEPA, 40 CFR Part 51 Appendix W, 2011. Available at: http://www.gpo.gov/fdsys/pkg/CFR-2011-title40-vol2/pdf/CFR-2011-title40-vol2-part51-appW.pdf. Accessed: February 2014.

- Summary of construction related AQ impact is evaluated using EXCEL spreadsheet called "\\2_Construction_AQ_Impacts\AERMOD_PostProcessing_ConstAQImpacts\AQ_Impacts_Constr Summary.xlsx". This file post-processes calculations from databases. For all pollutants, the maximum impact from all scenarios is estimated. As described earlier the Ambient Ratio Method is used to estimate the NO_2 impacts.

Operation Related Air Quality Electronic File Description

- Unitary emission rates were modelled using AERMOD for area sources, and 2005 – 2007 MET data. AERMOD output files can be found in the folder \4_Operational_AQ_Impacts\AERMOD_Files_OperationAQImpacts.

- Using AERMOD output files, maximum dispersion rates for different averaging times (1 hour, 8 hour, 24 hour, and annual) are calculated Access databases 1_Operational_DispersionFactors_1hrAvgTime.accdb, 2_Operational_DispersionFactors_8hrAvgTime.accdb, 3_Operational_DispersionFactors_24hrAvgTime.accdb, and 4_Operational_DispersionFactors_AnnualAvgTime.accdb located in the folder \4_Operational_AQ_Impacts\AERMOD_PostProcessing_OperationAQImpacts\.

- Operation ambient air quality impacts are then estimated the following Access database \4_Operational_AQ_Impacts\AERMOD_PostProcessing_OperationAQImpacts\5_Operational_AQ_Impacts.accdb.

- Description of database tables and queries in 5_Operational_AQ_Impacts.accdb:
  - Table "1_tbl_EmissionRate" is obtained from the Excel file \4_Operational_AQ_Impacts\AERMOD_PostProcessing_OperationAQImpacts\0_Operational AQ Impacts_Database Input.xlsx → tab: EmsRate(Access).
  - Tables "2a_tbl_1hrDispFac", "2b_tbl_8hrDispFac", "2c_tbl_24hrDispFac", and "2d_tbl_AnnualDispFac" are pulled from the dispersion factor databases 1 through 4.
  - Queries "1a_qry_CO_1hr", "1b_qry_CO_8hr", "2a_qry_NOx_1hr", "2b_qry_NOx_Ann", "3a_qry_PM10_24hr", "3b_qry_PM10_Ann", and "4a_qry_PM25_24hr" calculates ambient air impacts at each receptor using emission rates and dispersion factors. View these queries in "design view" to see the formulae.

Outputs from the database query are further processed in an Excel spreadsheet called \4_Operational_AQ_Impacts\AERMOD_PostProcessing_OperationAQImpacts\6_Operational_AQ_Impacts_Summary.xlsx.

LAXN-AR03-10
Comment:

Operational Mitigation Measures

7. The Lead Agency determined that the proposed project will exceed the CEQA regional operational significance thresholds for NOx and VOC emissions; therefore, SCAQMD staff recommends that the Lead Agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.

Transportation

a) Provide actual electric vehicle charging stations (not just wiring infrastructure).
b) Provide incentives to encourage public transportation.
c) Create local "light vehicle" networks, such as neighborhood electric vehicle systems.
d) Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery

trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this isn't feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.

Energy Efficiency

e) Maximize the use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility (not just wiring infrastructure).
f) Require all lighting fixtures, including signage, to be state-of-the art and energy efficient, and require that new traffic signals have light-emitting diode (LED) bulbs and require that light fixtures be energy efficient compact fluorescent and/or LED light bulbs. Where feasible use solar powered lighting.
g) Maximize the planting of trees in landscaping and parking lots.
h) Use light colored paving and roofing materials.
i) Use passive heating, natural cooling, solar hot water systems, and reduced pavement.
j) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
k) Install light colored "cool" roofs and cool pavements.
l) Limit the use of outdoor lighting to only that needed for safety and security purposes.

Other

m) Require use of electric lawn mowers and leaf blowers.
n) Require use of electric or alternatively fueled sweepers with HEPA filters.
o) Require use of water-based or low VOC cleaning products.

Response:

The comment identifies additional operational mitigation measures for consideration. The Draft EIR has identified feasible mitigation measures as listed in Section 4.2.3.3 LAX Master Plan Commitments and Project Design Features and on Page 4.6-12 under Los Angeles World Airports Sustainability Plan. The feasibility and applicability of the mitigation measures listed in the comment are discussed below:

a) The proposed Project Design Features (PDF AQ-4 and PDF GHG-4 in this Final EIR Chapter 3.0 Corrections and Additions to the Draft EIR) have been modified to include electric charging stations equal to 5% of the total number of parking spaces (not just wiring infrastructure as required by the City of LA Green Building Code Tier 1 A5.106.5.3.2, shown in Table 4.6-2 on Draft EIR p. 4.6-14) consistent with the comment.
b) The proposed Project includes a Transportation Demand Management Program (TDM) that would implement a number of programs for employers and employees including education and awareness programs promoting TDM programs, Project Design Features to promote bicycling and walking, ridesharing services and transportation assurance programs, and incentives for using alternative modes of travel (Draft EIR p. 4.14-92). The TDM program is intended to reduce trip generation for the office and research and development uses by a minimum of ten percent. The existing TDM program meets the recommendation as listed in the comment to provide incentives to encourage public transportation.
   In addition to the TDM program above, LAWA has voluntarily committed to forming a transportation management organization (TMO) to expand the function and effectiveness of the TDM program. A TMO provides TDM features to the whole area, rather than individual TDM programs for each employer or building within the Project. Further, the TMO can be opened to residents and businesses beyond the Project. The more participants a TMO has, the more effective it can be as it becomes easier to match people together for carpools or vanpools. Because the TMO requires a critical mass of participants before it can be successful, it would be formed beginning when 55% of the Project was

constructed, per the mitigation phasing program described on page 4.14-106 of the Draft EIR. Response to Comment LAXN-AL06-8 provides more detail about the formation and organization of the TMO.

c) The creation of a local "light vehicle" network with the proposed Project is not feasible based on the broader integration required over a much larger geographic area to ensure that a viable network is created. Note that the proposed Project does have components of such a network including a TDM program and the formation of a TMO to promote the use alternate modes of travel such as ridesharing services, bicycling, and walking as described in Response to Comment LAXN-AR03-10 b). The proposed Project also includes the installation of electric charging stations in parking lots (PDF AQ-4 and PDF GHG-4 in this Final EIR Chapter 3.0 Corrections and Additions to the Draft EIR) to encourage the use of low emission vehicles.

d) LAWA does not have the jurisdiction over on-road vehicular emissions, including emissions from trucks used by future tenants or third-party vendors on the Project Site, therefore it is not feasible to implement this mitigation measure. California Air Resources Board, which does have jurisdiction, is currently implementing the Truck and Bus Regulation in a phased manner to reduce emissions from trucks (http://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm).

e) The proposed Project includes prewiring of buildings for future solar installation (as required by the City of LA Green Building Code Tier 1 A5.211.4, shown in Table 4.6-2 on Draft EIR p. 4.6-15) and installation of solar panels on parking structures where feasible (LAX Master Plan EIR/EIS Commitments MM AQ-3 on Draft EIR p. 4.2-35). LAWA is currently evaluating campus wide opportunities for solar panels and is in the process of identifying the optimum locations for solar panel placement. The proposed Project is designed to not preclude solar panel installation. However, at this time specific building locations and designs for the proposed Project and the most effective locations for solar panel placement within the LAWA campus are not known. Therefore, although installation of solar panels is a goal of LAWA's, further specific requirements for solar panel installation at the Project site cannot be made at this time.

f) The proposed Project will exceed the 2008 energy efficiency standards as defined in the California Energy Code Title-24 Part 6 by 15% (PDF GHG-3 on Draft EIR p. 4.6-41). In order to achieve this, building lighting shall incorporate current energy efficient fixtures and technology (PDF U-20 on Draft EIR p. 4.15-43, PDF E-1 on Draft EIR p. 4.15-38, and LAX Northside Plan Design Guidelines and Standards[7] 06.6 on p. 79) which is consistent with SCAQMD's proposed measure that requires the use of energy efficient light fixtures. The proposed Project GHG emissions are less than significant and therefore no further mitigation measures like solar powered lighting are required. Furthermore, street lights are under the jurisdiction of the City of Los Angeles (i.e., the Bureau of Street Lighting in the Department of Public Works). The Bureau of Street Lighting has made the use of LED street lights standard practice.[8]

g) The proposed Project already incorporates this mitigation measure as part of the LAX Northside Plan Design Guidelines and Standards[9] that include the following standards for parking lots (Design Guideline/Standard number 05.2H on p. 72):

- A minimum of one tree for every four parking spaces shall be provided. Trees should be sized at 24-inch box or larger at the time of installation and remaining landscaped area shall contain understory planting.

[7] Rios Clementi Hale Studios, LAX Northside Plan Design Guidelines and Standards, May 2014. Available at http://www.lawa.org/GDZ/pdf/LAXN%20Design%20Guidelines.pdf. Accessed September, 2014.
[8] Available at: http://bsl.lacity.org/downloads/led/municipalities-utilities/LED_notice_to_designers.pdf. Accessed: September, 2014.
[9] Ibid

- Any portion of the parking area not used for parking, loading drive aisles, or pedestrian connectivity shall be landscaped.

The existing mitigation measure meets the recommendation as listed in the comment to maximize the planting of tress in landscaping and parking lots.

h) The proposed Project includes light colored roofing materials (PDF U-19 on Draft EIR p. 4.15-43) and porous paving materials (LAX Northside Plan Design Guidelines and Standards[10] 05.2H on p. 72). The proposed Project GHG emissions are less than significant and therefore no further mitigation measures are required.

i) The proposed Project will comply with the LAX Master Plan EIS/EIR Commitments that require installation of solar panels on parking structures where feasible to supply electricity or hot water (LAX Master Plan EIR/EIS Commitments MM AQ-3 on Draft EIR p. 4.2-35). As discussed in the response to comment LAXN-AR-03, Comment No. 10 g), any portion of the parking area not used for parking, loading drive aisles, or pedestrian connectivity shall be landscaped; thereby reducing areas covered by pavement and increasing shaded areas. The proposed Project GHG emissions are less than significant and therefore no further mitigation measures are required. The proposed Project will comply with the LAWA Sustainability Plan which requires compliance with the Tier 1 standards of the California Green (CalGreen) Building Code 2010 (Table 4.6-2 Draft EIR p.4.6-13). Compliance with CalGreen Tier 1 standards requires attainment of an energy efficiency that exceeds 2008 California Energy Code efficiency standards by 15% and the use of energy star equipment/appliances; it does not have specific requirements with regard to the use of passive heating or natural cooling. The proposed Project will comply with the LAX Master Plan EIS/EIR Commitments that require installation of solar panels on parking structures where feasible to supply electricity or hot water (LAX Master Plan EIR/EIS Commitments MM AQ-3 on Draft EIR p. 4.2-35). As discussed in the response to comment LAXN-AR03 10 g), any portion of the parking area not used for parking, loading drive aisles, or pedestrian connectivity shall be landscaped; thereby reducing areas covered by pavement and increasing shaded areas. The proposed Project GHG emissions are less than significant and therefore no further mitigation measures are required.

j) As discussed in the response to comment LAXN-AR03 10 f), the proposed Project includes the use of current energy efficient light fixtures and lighting technology (PDF U-20 on Draft EIR p. 4.15-43, PDF E-1 on Draft EIR p. 4.15-38, and LAX Northside Plan Design Guidelines and Standards[11] 06.6 on p. 79). The proposed Project also requires all appliances to meet Energy Star requirements, if an Energy Star designation is applicable for the appliance (as required by the City of LA Green Building Code A.5.210.1, seen in Table 4.6-2 on Draft EIR p. 4.6-15 and PDF U-17 on p. 4.15-42). The existing mitigation measure meets the recommendation as listed in the comment to utilize energy star heating, cooling, and lighting devices and appliances.

k) As described under the response to comment LAXN-AR-03, Comment No. 10 h), the proposed Project includes light colored roofing materials (PDF U-10 on Draft EIR p. 4.15-43) and porous paving materials (LAX Northside Plan Design Guidelines and Standards[12] 05.2H on p. 72). The proposed Project GHG emissions are less than significant and therefore no further mitigation measures are required.

[10] Ibid
[11] Ibid
[12] Ibid

l) The LAX Northside Design Guidelines and Standards[13] (Design Guideline/Standard number 05.2K on p. 73 and 06.6 on p. 79) provide specific standards for site (outdoor) and building (indoor) lighting. These standards ensure that lighting is designed to provide ambiance, safety and security without unnecessary spillover or glare onto adjacent properties. The existing standards meet the recommendation as listed in the comment to limit the use of outdoor lighting.

m) LAWA does not have jurisdiction over the equipment used by commercial landscapers employed by future tenants on the proposed Project site; therefore it is not feasible to implement this mitigation measure. However, as described in LAX Master Plan EIR/EIS Commitments MM AQ-4 on Draft EIR p. 4.2-36, LAWA will educate and encourage future tenants to contract with commercial landscapers who operate lowest emitting equipment. Further, LAWA will provide the necessary infrastructure (wiring and plugs) at appropriate locations on the proposed Project site that can be used for electric landscaping equipment (PDF AQ-5 and PDF GHG-5 in this Final EIR Chapter 3.0 Corrections and Additions to the Draft EIR).

n) Street sweepers are typically operated by the City of Los Angeles and are not within LAWA's jurisdiction for this Project. The Project does not anticipate the use of street sweepers as part of operations.

o) The proposed Project will meet the SCAQMD requirements for water-based or low-VOC cleaning products as listed in SCAQMD Rule 1143.

LAXN-AR03-11
Comment:

Construction Mitigation Measures

8. The Lead Agency determined that the proposed project will exceed the CEQA construction significance threshold regionally for NOx and VOC's; therefore, SCAQMD staff recommends that the Lead Agency provide the following additional mitigation measure pursuant to CEQA Guidelines Section 15126.4.

a) Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks) and if the Lead Agency determines that 2010 model year or newer diesel trucks cannot be obtained the Lead Agency shall use trucks that meet EPA 2007 model year NOx emissions requirements.

b) Construct or build with materials that do not require painting.

Further, based on page 4.2-49 of the Draft EIR it appears that the Lead Agency is committed to including Tier 4 engines during construction, however, SCAQMD staff recommends that the Lead Agency provide additional discussion that explicitly identifies this mitigation measure. Specifically, the SCAQMD staff recommends that the Lead Agency include the following:

c) During project construction, all internal combustion engines/construction, equipment operating on the project site shall meet EPA-Certified Tier 3 emissions standards, or higher according to the following:

- ✓ Project start, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- ✓ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition,

[13] Ibid

all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

Encourage construction contractors to apply for SCAQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for SCAQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website:
http://www.aqmd.gov/tao/Implementation/SOONProgram.htm

Response:

The comment identifies additional construction mitigation measures for consideration. The Draft EIR has identified feasible mitigation measures as listed in Section 4.2.3.3 LAX Master Plan Commitments and Project Design Features. Detailed responses regarding specific mitigation measures are provided below:

a) LAWA has committed to a mitigation measure consistent with the comments. The Project mitigation measure commits to using trucks that meet the United States Environmental Protection Agency 2010 standards for on-road heavy-duty trucks (Draft EIR p. 4.2-18).
b) The proposed Project will use low VOC architectural coatings that are compliant with SCAQMD's Rule 1113, in order to reduce the VOC emissions from this source. LAWA will provide informational materials to developers regarding building materials that do not require painting (PDF AQ-9 in this Final EIR Chapter 3.0 Corrections and Additions to the Draft EIR)
c) The proposed Project includes a Project Design Feature to use Tier 4 engines during construction. This commitment is shown in PDF AQ-8 and PDF GHG-6 included in Chapter 3.0 Corrections and Additions to the Draft EIR.

LAXN-AL01 **Ali Poosti** **Bureau of Engineering** **6/11/2014**

LAXN-AL01-1

Comment:

This is in response to your June 4, 2014 letter requesting a review of your proposed project to update regulations for development at the Project site. The Bureau of Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

LAXN-AL01-2

Comment:

<u>WASTEWATER REQUIREMENTS</u>

The Bureau of Sanitation, Wastewater Engineering Services Division (WESD) has reviewed the request and found the project to be related to setting new regulations for future development occurring within the Northside area of the LAX Specific Plan only. Based on the project description, we have determined that the project lacks sufficient detail for us to offer sewer analysis at this time. As the nature of your project becomes clear, please continue to send us information so that we may determine if a sewer

assessment is required in the future

If you have any questions, please call Kwasi Berko of my staff at (323) 342-1562.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. As noted, the proposed Project provides a new design plan and detailed development guidelines and standards to establish new regulations for the future development of the LAX Northside. Although no specific development projects are proposed at this time, Section 4.15 Utilities/Services of the Draft EIR contains information related to existing wastewater conditions, the proposed Project Design Features related to wastewater, and construction and operational impacts of the proposed Project on wastewater generation, conveyance, and treatment. LAWA has committed to implement the following measures as Project Design Features (PDFs) for the entire Project site:

- PDF Utilities/Services (U)-1: Compliance with Ordinance No. 181480 of the Los Angeles Municipal Code, including but not limited to:
  - High Efficiency Toilets with flush volume of 1.0 gallons of water per flush (Table 5.303.2.2)
  - Reduce wastewater by 20% by installing water-conserving fixtures (water closets, urinals) or utilizing non-potable water systems (Section 99.05.303.4)

Additionally, Section 4.15.3.4.1 of the Draft EIR contains wastewater generation estimates for short-term construction and long-term operational use based on land use generation factors developed by the City of Los Angeles Bureau of Engineering Sewer Design Manual, Part F 200: Projection of Flows and Hydraulics of Sewers. Table 4.15-11 on page 4.15-47 details the proposed Project land uses, quantity of development, employees, and higher education students, wastewater generation factors, and resulting wastewater generation. The estimated 269,580 gpd wastewater generation for the proposed Project would use approximately 0.09 percent of the total available flow capacity (291 mgd) within the NCOS and NORS. Additionally, the estimated 269,580 gpd wastewater generation of the proposed Project would use only about 1.7 percent of the projected available flow capacity (15 mgd) of the HTP in 2020.The proposed Project would require new local wastewater collection infrastructure that would convey wastewater to the NCOS and NORS, but the construction of this new infrastructure would be incorporated into the proposed Project as part of LAX Master Plan Commitment PU-1, which requires implementation of a utility relocation program during construction. The proposed Project was found to have less than significant impacts to wastewater generation, conveyance, and treatment based on the City of Los Angeles CEQA Thresholds Guide thresholds of significance related to wastewater. Individual development projects that comply with the proposed Project would fall within the development envelope evaluated in the Draft EIR, and therefore would also have a less than significant impact to wastewater generation, conveyance, and treatment. However, should individual development projects require further review, they will be submitted to the Bureau of Sanitation, Wastewater Engineering Services Division to confirm the analysis in the Draft EIR.

No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-AL01-3

Comment:

<u>STORMWATER REQUIREMENTS</u>

The Bureau of Sanitation, Watershed Protection Division (WPD) is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within

the City of Los Angeles. We anticipate the following requirements would apply for this project.

POST-CONSTRUCTION MITIGATION REQUIREMENTS
The project requires implementation of stormwater mitigation measures. These requirements are based on the Standard Urban Stormwater Mitigation Plan (SUSMP) and the recently adopted Low Impact Development (LID) requirements. The projects that are subject to SUSMP/LID are required to incorporate measures to mitigate the impact of stormwater runoff. The requiremetns are outlined in the guidance manual titled *"Development Best Management Practices Handbook – Part B: Planning Activities"*. Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: www.lastormwater.org. It is advised that input regarding SUSMP requirements be received in the early phases of the project from WPD's plan-checking staff.

GREEN STREETS
The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-away to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the SUSMP/LID requirements

CONSTRUCTION REQUIREMENTS
The project is required to implement stormwater control measures during its construction phase. All projects are subject to a set of minimum control measures to lessen the impact of stormwater pollution. In addition for projects that involve construction during the rainy season that is between October 1 and April 15, a Wet Weather Erosion Control Plan is required to be prepared. Also projects that disturb more than one-acre of land are subject to the California General Construction Stormwater Permit. As part of this requirement a Notice of Intent (NOI) needs to be filed with the State of California and a Storm Water Pollution Prevention Plan (SWPPP) needs to be prepared. The SWPPP must be maintained on-site during the duration of construction.

If there are questions regarding the stormwater requirements, please call Kosta Kaporis at (213) 485-0586, or WPD's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 3rd Fl, Station 18.

Response:

This comment regarding post-construction mitigation requirements is noted for the record and will be forwarded to the decision-makers for review and consideration. As indicated in Section 4.8 Hydrology and Water Quality of the Draft EIR, LAWA will address water quality issues, including erosion and sedimentation, and comply with the SUSMP requirements by designing the storm water system through incorporation of the structural and treatment control BMPs specified in the SUSMP per LAX Master Plan EIS/EIR Commitment Hydrology and Water Quality-1. Conceptual Drainage Plan. Additionally, as noted in Section 4.8.3.3.2 Project Design Features of the Draft EIR, Project Design Features (PDF) Hydrology and Water Quality (HW)-2, PDF HW-2, PDF HW-3, PDF HW-4, PDF HW-6, PDF HW-7, PDF HW-8, and PDF HW-9, PDF HW-11, PDF HW-12, PDF HW-14, PDF HW-15, PDF HW-16, PDF HW-17, PDF HW-18, PDF HW-26, PDF HW-27, PDF HW-28, PDF HW-30, PDF HW-31, PDF HW-32, PDF HW-33, and PDF HW-36 require the project to integrate applicable BMP requirements related to SUSMP and the City's LID Ordinance, including those set forth in the City's *"Development Best*

Management Practices Handbook – Part B: Planning Activities".

This comment regarding the City's Green Street's Initiative is noted for the record and will be forwarded to the decision-makers for review and consideration. The proposed Project shares the Green Street's Initiative's goals for paved areas, including improving water quality of stormwater runoff, recharging local ground water basins, improving air quality, reducing the heat island effect of street pavement, enhancing pedestrian use of sidewalks, and encouraging alternate means of transportation. Project Design Features PDF HW-18, PDF HW-33, and PDF HW-36 require landscaping in the LAX Northside Center District, LAX Northside Campus District, and LAX Northside Airport Support District to be designed to advance sustainability. Drought-tolerant plant materials will be allowed to preserve water resources and bioswales would be used to remove silt and pollution from surface runoff water throughout the Project site, including parkways. Specifically, as noted in Section 4.8.3.3.2 Project Design Features of the Draft EIR, PDF HW-10, PDF HW-12, PDF HW-14, PDF HW-15, PDF HW-17, PDF HW-18, PDF HW-26, PDF HW-28, PDF HW-29, PDF HW-31, PDF HW-33, and PDF HW-36 require bioswales in parking lots, permeable paving in portions of parking lots, and design of parking lots to mitigate stormwater impacts. Additionally, the proposed Project includes a continuous pedestrian paseo along Westchester Parkway, composed of the existing ten foot sidewalk and a twelve foot wide path of stabilized decomposed granite, with landscaping. The proposed paseo would support the Green Street Initiative's goals related to pedestrian use of sidewalks and encouraging alternate means of transportation.

This comment regarding construction requirements is noted for the record and will be forwarded to the decision-makers for review and consideration. As noted in Section 4.8.3.4.1 Hydrology Project Impacts, the proposed Project would be required to implement the National Pollutant Discharge Elimination System (NPDES) General Construction Permit (GCP) during all construction activities, starting from mobilization through final closeout. The GCP includes regulations required of projects during construction. Construction would require the implementation of a SWPPP and temporary BMPs. The SWPPP would provide a plan that manages the specific needs and requirements of the proposed Project, and individual construction sites within it, and would manage the hydrology of surface water on the Project site during construction. The SWPPP would be required to be in place prior to ground disturbance on the Project site. Additionally, construction of the proposed Project would comply with all applicable regulations, including the Wet Weather Erosion Control Plan and California General Construction Stormwater Permit, as applicable.

LAXN-AL01-4

Comment:

SOLID RESOURCE REQUIREMENTS

The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact Daniel Hackney of the Special Project Division at (213)485-3684.

Response

This comment regarding solid resource requirements is noted for the record and will be forwarded to the decision-makers for review and consideration. The proposed Project does not include any residential development. However, the proposed Project does incorporate recycling. As discussed in Section 4.15.2.2.3 Solid Waste of the Draft EIR, to comply with AB 939, LAWA's Construction & Maintenance, Recycling Division has implemented a recycling program to achieve a 70 percent waste reduction goal by 2020.

Additionally, as noted in section 4.15.3.3 LAX Master Plan Commitments and Project Design Features of the Draft EIR, LAX Master Plan EIS/EIR Commitments Solid Waste (SW)-1 and SW-3 require implementation of an enhanced recycling program and recycling of construction and demolition waste.

LAXN-AL02 **Donald R. Duckworth** **Westchester Town Center Business Improvement District** **6/11/2014**

LAXN-AL02-1

Comment:

This letter is written to transmit the Westchester Town Center Business Improvement District Board of Director's formal endorsement of the proposed Northside Landuse Plan Update as circulated.

The Board represents every commercial property owner within the Westchester Town Center area. It has received numerous presentations from LAWA staff and others as this Plan has evolved and many of its members have participated directly in its multi-year preparation. The extensive outreach and stakeholder involvement conducted in conjunction with the Plan's preparation has been remarkable and inspired the faith of the Board members in the Plan and LAWA's staff that prepared it.

The Board of Director's of the WTC BID strongly supports the proposed Northside Landuse Plan Update and encourages its implementation without delay so that the local community can realize its benefits.

Response:

This comment regarding the Westchester Town Center Business Improvement District's support of the proposed Project is noted for the record and will be forwarded to the decision-makers for review and consideration.

LAXN-AL03 **Donald R. Duckworth** **Westchester Town Center Business Improvement District** **6/19/2014**

LAXN-AL03-01

Comment:

This letter is written to transmit the Westchester Town Center Business Improvement District Board of Director's formal endorsement of the proposed Northside Landuse Plan Update as circulated.

The Board represents every commercial property owner within the Westchester Town Center area. It has received numerous presentations from LAWA staff and others as this Plan has evolved and many of its members have participated directly in its multi-year preparation. The extensive outreach and stakeholder involvement conducted in conjunction with the Plan's preparation has been remarkable and inspired the faith of the Board members in the Plan and LAWA's staff that prepared it.

The Board of Director's of the WTC BID strongly supports the proposed Northside Landuse Plan Update and encourages its implementation without delay so that the local community can realize its benefits. The Board believes that build-out of the proposed Plan will benefit the existing business community and attract more business to the area.

Response:

This comment is the same as letter LAXN-AL02, however it includes an additional sentence noting that build-out of the proposed Project will benefit existing businesses and attract more business to the area. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

LAXN-AL04	Christina V. Davis	LAX Coastal Chamber of Commerce	7/17/2014

LAXN-AL04-1
Comment:

The LAX Coastal Chamber of Commerce is an organization dedicated to the promotion of business opportunity in our service area which includes Westchester, Playa del Rey, and Marina del Rey and surrounding communities. The Chamber has extensively reviewed the Draft Environmental Impact Report ("DEIR") for the LAX Northside Plan Update and conducted meetings to generate further input and discussion. At its meeting on July 17, 2014, the Board of Directors voted to support the proposed Update to the LAX Northside Plan as more particularly discussed herein below and to submit this letter to the public record as the Chamber's comments to the DEIR.

Response:

This comment regarding the LAX Coastal Chamber of Commerce's support of the proposed Project is noted for the record and will be forwarded to the decision-makers for review and consideration.

LAXN-AL04-2
Comment:

The Chamber specifically wishes to acknowledge and commend LAWA and in particular Lisa Trifiletti for their willingness to work with the Chamber to maintain a dialogue regarding the future of this land adjacent to the communities we represent and their willingness to discuss potential ways to accommodate the concerns raised by the Chamber in meetings with LAWA officials. The access to the design team, planners and engineers provided to the Chamber was instrumental in assisting us to develop a thorough understanding of updated plan for the Northside project. We also thank LAWA for extending the deadline for the submission of these comments.

Response:

This comment regarding the LAX Coastal Chamber of Commerce's support of the process to develop the proposed Project and extension of the public review period is noted for the record and will be forwarded to the decision-makers for review and consideration.

LAXN-AL04-3
Comment:

At the outset it is critical to note that the updated plan dramaticly reduces the scale of the already entitled development project thereby reducing the potential for adverse impacts on the surrounding community. The revised project will provide land for mixed use development and additional green space for the community's benefit. There will be significant local employment opportunities associated with the proposed mixed-use development and this is also a positive.

Response:

This comment identifies that the reduced scale of development and mix of land uses will be community benefits provided by the proposed Project. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

LAXN-AL04-4
Comment:

These written comments to the Draft EIR are focused on the impacts of the proposals on the surrounding business and residential communities served by the Chamber. As a result, our focus in submitting these comments is on those portions of the EIR which have an impact upon these issues. Our focus has not been on impact on air quality, hydrology and water quality, cultural resources, biotic communities, endangered and threatened species, wetlands, floodplains, coastal zone management, light emissions, solid waste, hazardous materials or any number of other areas required to be included in the EIR.

In the comments contained herein, we draw the conclusion that we should support the preferred alternative subject to the further consideration of this issue raised.

Response:

This comment regarding the scope of the LAX Coastal Chamber of Commerce's comments and support of the proposed Project is noted for the record and will be forwarded to the decision-makers for review and consideration.

LAXN-AL04-5
Comment:

Update Dramatically Downsizes Scale of Development
As noted in the analysis of the existing fully-entitled plan compared to the proposed updated plan, this proposal reduces the commercial development of the site from 4,500,000 square feet to 2,320,000 square feet. This is not a choice between open space and development. It is, in fact, a massive rethink of the much larger scale development that is already entitled. It will reduce building heights, create larger setbacks and provide greater buffer between the project site and existing residences to the north. The low impact, tech-oriented, creative campus settings envisioned in the "Northside Campus" is consistent with the creative economy that is relocating and developing in the area.

Response:

This comment regarding support for the proposed Project's reduction in development size and scale is noted for the record and will be forwarded to the decision-makers for review and consideration.

LAXN-AL04-6
Comment:

To be most successful, we strongly believe that the Northside must connect with the existing Westchester Business District oriented along Sepulveda Boulevard from Manchester Boulevard at the north to Lincoln Boulevard at the south. The synergy coming from walking distance development is crucial to the success of both the Northside and the Westchester Business District. As such, we agree with the overall design philosophy of placing the highest density uses the farthest east (Areas 11 and 12A) and tapering off to open space/recreational areas at the far western end of the project.

Response:

This comment regarding agreement with the proposed Project's design philosophy is noted for the record and will be forwarded to the decision-makers for review and consideration.

LAXN-AL04-7
Comment:

Consistent with this also is the critical nature of the proposal to providing space into which local higher education can expand and further serve the burgeoning creative economy.

Response:

This comment regarding the proposed Project's inclusion of higher educational uses as an allowable land use is noted for the record and will be forwarded to the decision-makers for review and consideration.

LAXN-AL04-8
Comment:

We do note that we have received input that there is further opportunity to refine these concepts to include requirements for mature foliage in the buffer zones (Area 2B in particular) and potentially to create a running or bicycling path in these areas and would encourage this a part of final designs consistent with the proposed "pedestrian access paseo."

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration The proposed Project includes measures to preserve existing

mature trees, as feasible. As noted in the Draft EIR Section 4.1.3.3.1 LAX Master Plan EIS/EIR Commitments, the proposed Project will comply with LAX Master Plan mitigation measure (MM) Biotic Communities MM-BC-3: Conservation of Floral Resources – Mature Tree Replacement. This measure requires LAWA or its designee to prepare and implement a plan to compensate at a ratio of 2:1 the loss of mature trees that would occur as a result of implementation of the LAX Northside project and that replacement trees be at least a 15-gallon or larger specimen. Additionally, PDF Biological Resources (B)-11 and PDF Recreation (R)- 3 require that existing trees in the Landscape Buffer be preserved when compatible with the proposed Project's landscape material palettes. The proposed Project tree palette reflects compliance with FAA safety requirements for landscaping near an active airport (which restricts trees that form thick canopies or attract birds), as well as input and acceptance from the LAWA Maintenance Services, City of Los Angeles Bureau of Street Services, and US Fish and Wildlife Services.

A series of design charrettes, open houses, and community leaders meetings were held in 2012 and 2013 to define the uses allowed in each area within the Project site in collaboration with community stakeholders. Early design concepts included inclusion of pedestrian pathways and bicycle routes in the Landscape Buffer area, however concerns were expressed by residents to the north of the Landscape Buffer area regarding security and privacy. As a response to these concerns, the LAX Northside Design Guidelines and Standards were refined to include a pedestrian accessible paseo along the north side of Westchester Parkway, to preserve the existing bike route on Westchester Parkway, and to include native landscaping and no active recreational uses in the Landscape Buffer area. The proposed design and distribution of uses in the proposed LAX Northside Design Guidelines and Standards reflects community input.

LAXN-AL04-9
Comment:

<u>"Northside Center" Land Use Restrictions on "Big Box" and "Chain Store" Retail</u>
The DEIR proposes to limit the square footage of retail developments in the areas to the east of Lincoln Blvd generally referred to in the DEIR as the "Northside Center" to a maximum of 100,000 square feet. We understand this to be a noble attempt to prevent the intrusion of so-called "Big Box" retail stores and while we applaud the concept, we do not believe it goes far enough. Recent developments in this commercial space have included the development of variants for inner city or urban locations in the approximate 60,000 square foot size. We believe that "Northside Center" retail establishments should be limited to nothing in excess of 50,000 square feet.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. As noted in Section 2.4.1.2 Proposed Land Uses and Illustrative Site Plan of the Draft EIR, the proposed Project Mixed-Use Commercial land use category excludes big box retail stores over 100,000 square feet. The proposed Project allowed and excluded land uses were developed through a series of design charrettes, open houses, and community leaders meetings held in 2012 and 2013 with community stakeholders. Through community input and independent retail and market analysis conducted by LAWA, the 100,000 square foot maximum building size was determined as appropriate to prevent incompatibly sized uses, while meeting the proposed Project objectives. As noted in Section 2.6 of the Draft EIR, the proposed Project objectives related to economic development include:

- Ensure that Project site development achieves fair market value.
- Protect private investment, both existing and future, by assuring compatibility among adjacent developments and avoiding future conflicts.
- Enable the development of complementary and synergistic uses that create a critical mass to support economic vitality in the Project site and surrounding communities.

Furthermore, the proposed Project objectives related to community compatibility, urban design guidelines, and sustainability include:

- Establish an appropriate scale for development.
- Establish development guidelines that are flexible yet reflect the latest best-practices in urban design and sustainability, including the promotion of native landscape strategies, and comply with established FAA airport safety regulations.
- Reflect current community and stakeholder interests for additional open space, research and development, recreation, security, community-serving uses, and economic development.

As noted in section 4.9.2.1.1 of the Draft EIR, the proposed Project must also comply with FAA requirements to rent or use the property that achieves fair market value.
Consistent with the proposed Project objectives and FAA fair market requirements, the proposed Project enables development of the LAX Northside Center District that will achieve fair market value, be compatible with the surrounding community, support economic vitality, be appropriately scaled, be flexible, and reflects interests for economic development. The proposed Project's development standards, including but not limited to height limits, setback requirements, stepback requirements, landscaping and buffer requirements provide for development that is appropriately scaled. Further limiting the total square footage of uses in the LAX Northside Center District would not change the environmental impacts as analyzed in the Draft EIR, however it would limit the proposed Project's flexibility to accommodate future market demands.

No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-AL04-10
Comment:

Furthermore, we believe that there should be an additional limitation on retailers in the "Northside Center" such that so-called "chain stores" comprise no more than 50% of the overall development. This would be more in character with the local business community and be consistent with the avowed purpose of creating a project which meets the criteria of an overall benefit to the community while also meeting FAA requirements for uses providing fair value to the airport.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. Please see response to comment LAXN-AL04-9 above. Restricting retailers in the LAX Northside Center District to no more than 50% "chain stores" would not meet the proposed Project objectives to allow flexibility to respond to future market demands. As the specific retail tenant mix for future development is not known at this time, such a restriction could prevent economic development of the LAX Northside Center District, which could hinder the proposed Project from meeting FAA fair market value requirements. Furthermore, the proposed Project LAX Northside Design Guidelines and standards are structured so that any retail tenant, whether a "chain store" or not, would be compatible with and in character with surrounding uses through development standards, including but not limited to height limits, setback requirements, stepback requirements, landscaping and buffer requirements.

No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-AL04-11
Comment:

Areas 1 and 2A: Stormwater Treatment Facility and Open Space
Critical to the overall plan is that, in providing dense development at the eastern end of the project, there be some protected areas at the far west end in Areas 1 and 2A. We are concerned that plans for the envisioned stormwater treatment facility to be funded by Prop O funds from the City of Los Angeles may be in jeopardy due largely to inaction by the City of Los Angeles, to address FAA revenue diversion issues. We believe these facilities must be located here in order to preserve the open space and recreational possibilities for these parcels as a part of the treatment facility. In any event, Areas 1 and 2A should not, under any circumstances, be made available for uses inconsistent with the community in those areas and should remain open for future use as envisioned by the DEIR. There should be no decision to "spread" the commercial uses of adjacent areas onto these two parcels under any circumstances. LAWA and LABOS are both departments of the same City, of which we are a part, and need to find a way to work together to make this facility and these community-serving uses a reality.

Response:

This comment regarding coordination between LAWA and LABOS in order to facilitate development of Area 1 and Area 2A with a stormwater treatment facility and open space is noted for the record and will be forwarded to the decision-makers for review and consideration. LAWA continues to coordinate with LABOS and the FAA to enable development of Area 1 with a stormwater treatment facility and open space that complies with FAA requirements regarding revenue diversion. On August 25, 2014 LAWA signed a Letter of Intent with the City of Los Angeles Bureau of Sanitation to jointly develop facilities at the Project site designed to minimize the discharge of pollutants to Santa Monica Bay through stormwater runoff. On November 6, 2014 the LAWA Board of Airport Commissioners authorized the Executive Director to execute a Memorandum of Understanding between the City of Los Angeles Department of Public Works, Bureau of Sanitation and the City of Los Angeles Department of Airports for the preparation of design and environmental documents for the proposed Argo Drain Sub-basin and the Hyperion connection which includes a new high-flow diversion structure to divert LAWA's stormwater runoff in the Imperial/Pershing Sub-basin to the Hyperion Treatment Plant. The City of Los Angeles Board of Public Works authorized the Director of Bureau of Sanitation to execute the Memorandum of Understanding on November 19, 2014. The Argo Drain Sub-basin Facility would be located generally underground and could potentially allow open space uses to be developed on the surface at the Project site. The proposed Project sets the regulatory framework that would allow these uses to be developed. Any such project would be subject to further review and approval under the CEQA.

As noted in Section 2 Project Description of the Draft EIR, Office, Research and Development uses would only be developed on Area 1 in the event the LABOS facility is not approved (Table 2-3). Should any such uses be developed in Area 1 the proposed Project's development standards, including but not limited to the vehicle trip cap, height limits, setback requirements, landscaping and buffer requirements would apply and in no event would the maximum proposed Project total of 2,320,000 square feet or 23,635 total new daily vehicle trips be exceeded, ensuring that new development is consistent with the community. Additionally, Open Space and Recreation uses are allowed in Area 2 as well as Office, Research and Development uses. As noted in Section 4.9.3.3.3 Project Design Features of the Draft EIR new recreational space can only be developed in conjunction with other commercial uses that achieve fair market value at the Project site. These requirements are consistent with FAA requirements to achieve fair market value, which prevent LAWA from allowing development of open space without corresponding development that achieves fair market value.

No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-AL04-12
Comment:

Traffic
As an overarching rule that should be applied to traffic as it relates to the proposed updated plan, through design features, traffic should be funneled to and from the Northside as directly as possible to the adjacent 105 and 405 freeways. More specifically it should be diverted from and not through adjoining residential areas. Chief among these concerns being prevention of expansion of the capacity of the Pershing/Nicholson north/south corridor. This would appear to be consistent with PDF LU-20 and 21; however, the traffic study shows significant traffic coming through these areas causing confusion and concern on our part. We would also like to have seen an appropriate "Neighborhood Protection Plan" as a component of the DEIR including but not limited to traffic calming measures that can help address these concerns.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

The comment specifically refers to Project Design Features (PDFs) LU-20 and LU-21 on page 4.9-40 of the Draft Environmental Impact Report. LU-20 restricts the Project from providing direct access to the residential areas north of the Project Site. LU-21 prohibits direct access to Lincoln Boulevard, Pershing Drive, and all local streets north of the Project Site, unless extreme site constraints leave no alternative access. The comment acknowledges that the PDFs are consistent with the community's goals to prevent the need to expand the capacity of the Pershing/Nicholson corridors. These PDFs prevent the Project from providing *direct* access to any of those streets. In the case of the residential streets north of the Project Site, it is unlikely that Project traffic would use them as none provide convenient bypass routes for traffic travelling between the Project Site and outlying areas. Lincoln Boulevard and Pershing Drive, however, are both Major Highways that are designed to carry large volumes of traffic, and it is appropriate and necessary that both will carry Project traffic.

The fact that Project traffic was projected to be distributed on Pershing Drive and Nicholson Drive (en route to Culver Boulevard) is acknowledged in the traffic analysis. Some Project traffic will likely travel along the Pershing/Nicholson corridor. The trip distribution shown in the traffic study projects that 2.4% of Project trips will utilize this corridor. The trip distribution estimate does not mandate the actual distribution of Project traffic. Instead, it estimates the most likely pattern of trip distribution and measures the results of that pattern against the City's established significant impact criteria. It is worth noting that the Project, as a primarily commercial development, generates heavier inbound traffic flow during the morning peak hour and outbound traffic flow during the afternoon peak hour. As shown in Table 4.14-8 on pages 4.14-47 and 4.14-48 of the Draft Environmental Impact Report, approximately 80% of the morning peak hour trips are in the inbound direction (1,584 inbound trips out of 2,009 total trips) and approximately 70% of the afternoon peak hour trips are in the outbound direction (1,785 outbound trips out of 2,543 total trips). On Pershing Drive and Nicholson Street northwest of the Project Site, the heavier traffic movement is in the opposite direction – heavy northbound (away from the Project Site) during the morning peak hour and heavy southbound (toward the Project Site) during the afternoon peak hour. As a result, Project traffic has a lesser effect on those intersections because signal green time is primarily dictated by traffic heading the opposite direction. The existing traffic volumes at the intersection of Nicholson Street & Culver Boulevard are shown in Figure 4B on page 29 of *Transportation Study for the LAX*

Northside Plan Update (Gibson Transportation Consulting, Inc., May 2014), which is included as Appendix E to the Draft Environmental Impact Report. Consistent with the neighborhood's goals, the Project does not propose any capacity enhancements on the Culver/Nicholson corridor.

Section 4.14.3.4.3 on pages 4.14-83 and 4.14-84 of the Draft Environmental Impact Report summarize the Project's neighborhood street analysis according to the requirements and impact criteria set forth by the City of Los Angeles. It does not identify any significant neighborhood street traffic impacts, in large part because of the lack of residential streets running parallel to congested arterial corridors such as would provide a reasonable alternative to remaining on the arterial corridor. Therefore, no neighborhood protection plan was required by LADOT standards to prevent Project traffic from cutting through the nearby residential neighborhoods.

LAXN-AL04-13
Comment:

The traffic study's analysis of project traffic impacts to intersection and freeway operations are generally consistent with relevant guidelines. However, opportunities exist for enhanced mitigation of intersection impacts, enhanced planning related to bicycle access and proposed high-capacity transit facilities and bicycle access.

It is apparent that some of the intersections will be adversely impacted by the Project (increased intersections with LOS E/F) and will not be improved in the "With Project With Mitigation" scenario.

	# of Intersections Operating at LOS D* or Better; Operating at LOS E** or F*** (average of AM, PM)		
	No Project	With Project	With Project with Mitigation
Existing (2012)	100; 8	94; 14	94; 14
Future (2022)	86; 22	84; 24	84; 24

*Level of Service (LOS). LOS D or better (i.e. A to C) is generally acceptable with LOS D approaching unstable traffic flow at the intersection during peak hours.
**LOS E indicates intersections operating at capacity (unstable flow).
***LOS F indicates forced or breakdown flow (the intersection is effectively over-capacity).

There may be opportunity to improve the operating efficiency of some of the intersections as part of the Project to improve this scenario. This represents an opportunity for further study.

Response:

The comment notes that some intersections will be impacted by Project traffic, and suggests that there are additional mitigation opportunities that should be studied further. The table provided in the comment summarizes the number of intersections operating at LOS D or better under conditions without the Project, with the Project, and with the Project after mitigation and notes that, after mitigation, the same number of intersections operate at LOS D or better (and thus, the same number operate at LOS E or F) as before mitigation. It should be noted that under Existing (No Project) conditions, a total of 95 intersections operate at LOS D or better during both peak hours, and 13 intersections operate at LOS E or F (see Table 4.13-3 on pages 4.14-17 through 4.14-24 of the Draft EIR). Therefore, as shown in the remainder of the table, the addition of Project traffic would only cause one additional intersection to operate at LOS E or F under Existing with Project conditions (from 13 to 14), and two additional intersections to operate at LOS E or F under Future with Project conditions (from 22 to 24). Further, the fact that none of the intersections are projected to improve from LOS E or F back to LOS D under "With Project with Mitigation" conditions does not indicate a lack of improvement to those intersections by the mitigation program, as the comment states. Rather, Project traffic would be modestly reduced at all study intersections by implementation of the proposed transportation demand management (TDM) program. Other mitigations including transportation systems management improvements, additional transit service on Metro Route 115, and physical improvements will improve operations at many intersections.

However, these improvements do not happen to result in enough improvement at any intersections operating at LOS E or F under "with Project" conditions to result in them operating at LOS D or better.

It is important to point out that the mitigation program does reduce most of the Project's significant impacts below a level of significance. Under Existing with Project Conditions, the Project would result in significant impacts to 11 intersections, but after the implementation of the mitigation program it would only impact 3 intersections. Under Future with Project Conditions, the Project would result in significant impacts to 18 intersections, but after the implementation of the mitigation program it would only impact 4 intersections. In fact, under both Existing with Project with Mitigation Conditions as compared to Existing with Project Conditions and Future with Project with Mitigation Conditions as compared to Future with Project Conditions, the three and four total intersections that would remain significantly impacted after implementation of Project mitigation would be improved – they simply would not be improved enough to fully mitigate the impacts to a level below significance.

Though the comment suggests that there are additional opportunities "for enhanced mitigation of intersection impacts, enhanced planning related to bicycle access and proposed high-capacity transit facilities and bicycle access," it gives no specific suggestions. All feasible traffic mitigation measures were explored by LAWA, consultants, and Los Angeles Department of Transportation (LADOT) during the development of the Draft EIR. The Project's mitigation program consists of the implementation of a transportation demand management (TDM) program designed to encourage alternative modes of travel to and from the Project Site, transportation systems management (TSM) improvements which upgrade traffic signal control and detection systems and improve the operating efficiency of intersections, transit improvements including the provision of additional buses for Metro Route 115 on Manchester Avenue and dedication of space on the Project Site for a future transit station, and specific intersection improvements at seven study intersections. Additionally, the Project includes design features such as the proposed Paseo, an off-street, multi-modal, pedestrian-oriented pathway located adjacent to Westchester Parkway and for the length of the Project Site.

LAXN-AL04-14
Comment:

The study also reports that by the year 2022, transit ridership will exceed available transit capacity during some peak hours runs (the exact methodology supporting this conclusion is not identified). To mitigate these potential future impacts to the regional transit system, the proposed Project proposes to purchase two additional transit buses for Route 115, supplementing bus service along Manchester Blvd during peak hours. Further, space on the Project site is proposed to be potentially developed as a future transit station.
The study identifies multiple major transit projects that are expected to be completed before the full development of the proposed Project (2022):

- Crenshaw/LAX Transit Corridor, to be completed in 2019
- Airport Metro Connector, to be completed in 2020
- South Bay Metro Green Line Extension, potentially to be completed in 2020

The new transit capacity to be provided by these new projects is not explicitly included in the above peak hour transit capacity calculations; these projects such as light rail projects, will provide substantial new transit capacity within the vicinity of the Project site. Given the close proximity of the proposed Project site to these transit projects, further consideration should be given to this how site could be serviced and integrated into these transit networks.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for

review and consideration. The comment states that the Draft EIR reports that transit ridership will exceed available transit capacity in year 2022 on some routes during the peak hours. However, as shown in Table 27 of the traffic study (page 253 of *Transportation Study for the LAX Northside Plan Update* (Gibson Transportation Consulting, Inc., May 2014), provided as Appendix E to the Draft EIR), all bus routes have some residual capacity in year 2022 during the peak hours. Some routes would approach peak capacity during their busiest runs of the hour, but none would exceed capacity based on the analysis. As noted in the comment, capacity from planned transit projects, including the Crenshaw/LAX Transit Corridor, the Airport Metro Connector, and the South Bay Metro Green Line Extension, were conservatively excluded from future transit capacity estimates for the purposes of assessing potential Project impacts to transit capacity. LAWA is working closely with Metro to ensure that the needs of transit users and airport users are met as major transit projects are planned in the vicinity of the Project Site and LAX.

LAXN-AL04-15
Comment:

Bicycle Access
The study also notes existing and proposed bicycle facilities. The most recent City of Los Angeles bicycle plan, the *2010 Bicycle Plan*, is cited. Pershing Dr. and Westchester Parkway already feature bicycle lanes and numerous streets within the study area are also proposed for future bicycle lanes and routes.

Opportunities may exist for additional enhanced bicycle facilities, both for on-street facilities and for bicycle storage. Such options would be especially desirable with the completion of anticipated nearby rail transit projects and a potential on-site transit center. These options should be studied further to better understand how such on-site networks could link to external networks.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. The Project includes several features directly intended to increase bicycle accessibility and usage within the Study Area. The Project will include a Paseo, which is a 12-foot-wide decomposed granite multi-use pathway located adjacent to the sidewalk on the north side of Westchester Parkway. Along with the sidewalk (10 feet wide) and on-street bicycle lane (6 feet wide with a 6-foot buffer space between the curb and the bike lane), this contiguous corridor of pedestrian and bicycle accessibility is 34 feet wide. On the west end of Westchester Parkway, it connects to an existing recreation path to the beach. Additionally, the Project will comply with the City's bicycle parking ordinance and it will have sufficient parking supply for bicycles. Finally, as part of the Project's transportation demand management (TDM) program, the Project would incorporate features for bicyclists and pedestrians, such as exclusive access points, secured bicycle parking facilities or a bicycle valet system, a bicycle sharing or rental program, and showers.

As the Project is developed and other transit projects are planned and constructed nearby (such as the Metro Crenshaw/LAX Transit Corridor, the Airport Metro Connector, and the South Bay Metro Green Line Extension), the Project will continue to seek ways to enhance connectivity to those transit lines.

LAXN-AL04-16
Comment:

Airport Support Areas/Vehicular Access
A significant portion of the project, comprising some 900,000 square feet, are the areas to the south of the Westchester Parkway and inside the security perimeter of the LAX airfield itself. Much of the proposed use of these areas is for future construction material staging and the relocation of facilities currently located on World Way which are being

displaced by development there such as the Midfield Satellite Concourse.

While we have no objection to the use of these areas for this purpose, the DEIR fails to address the vehicular access to these areas. To the extent that these Airport Support areas are presumably accessed only by those persons either directly employed by LAWA itself or its contractors, this presents a unique opportunity to fulfill the conceptual overview of funneling traffic to the adjacent 105/405 Freeways. As a means of mitigating impact on surrounding communities and intersections to the north, all LAWA employees and contractors working in such areas should be required to access these areas from on airport access at World Way and Pershing by means of ingress and egress from the south of this intersection only or off Sepulveda adjacent to the entrance to LAX. There should be no direct access to these areas from the Westchester Parkway nor should any LAWA employees or contractors access these areas via Pershing to the north of Westchester Parkway.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. As a point of correction, the comment states that the airport support uses would be up to 900,000 square feet. However, the Project's entitlement allows for a maximum of 600,000 square feet of airport support development. Also, it is important to note, as shown in Table 4.14-8 on pages 4.14-47 and 4.14-48, these airport support uses are only expected to generate a total of 16 trips during the morning peak hour and 70 trips during the afternoon peak hour – less than 1% of the total morning peak hour Project trip generation and approximately 2.8% of the afternoon peak hour Project trip generation. While these uses may be accessible internally to LAX and some of the trips to and from these uses may arrive and depart via World Way and Pershing Drive which is an access point that exists today, there is no significant impact resulting from these trips warranting the access restrictions suggested by the commenter. As shown in Table 4.14-14 on pages 4.14-114 through 4.14-121, all intersections along Westchester Parkway adjacent to the Project Site are projected to operate at LOS A during both the morning and afternoon peak hours. Further, it is important to maintain this access point for emergency service vehicles, and therefore its closure could result in a safety hazard.

LAXN-AL04-17
Comment:

<u>Airport Police Facilities</u>
Area 12 A East, currently in use for Fire Station 5, should also be studied as a potential location for the consolidation of Airport Police facilities currently scattered in multiple locations. We note that Airport Police currently have jurisdiction extending to Manchester Blvd. on the north and this location would provide quick access through the locked gate at the Fire Station. We are mindful that it may not be possible to relocate all Airport Police facilities here especially given the obvious need for quick response on the airfield and to Central Terminal Area buildings, but a substantial portion of administrative and other facilities could be potentially located here.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. As noted in Section 2 Project Description of the Draft EIR, Area 12A East is designated for Mixed-Use Commercial uses (Table 2-2 and Figure 2-5), including offices and airport-related administrative offices. Additionally, as noted in Section 2.4.1.3 The proposed Project would provide for future development to respond to future market conditions by allowing transfers and exchanges of development rights and land uses between Areas within the LAX Northside Center District. Airport Police Facilities would be considered a Community and Civic use, which is an allowed land use category in the LAX Northside Center District. Therefore, the proposed Project provides flexibility for Airport Police Facilities to be developed in Area 12A East, subject to the proposed Project's design standards.

No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-AL04-18
Comment:

Conclusion
As noted by the NOP, "The Proposed Project" is intended to create a vibrant, sustainable center of employment, retail, restaurant, office, hotel, research and development, education, civic, airport support, recreation, and buffer uses that support the needs of surrounding communities and LAWA." We concur with this conclusion and continue to be encourage [sic] by LAWA's work with the business community on the future development of the Northside. This project will bring additional commercial and retail development and along with it more local jobs and new open space amenities for our community.

As required by law, LAWA must respond to these comments in writing providing the necessary information, analysis, and as applicable, additional technical reports.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Per California Public Resources Code Section 21091 and California Code of Regulations Section 15088, LAWA has evaluated comments on environmental issues received from persons who reviewed the Draft EIR and has prepared written responses in this Final EIR.

LAXN-AL05 **Jeff Jacobberger** **Bicycle Advisory Committee of the City of Los Angeles** **7/20/2014**

LAXN-AL05-1
Comment:

As Chair of the City of Los Angeles Bicycle Advisory Committee ("BAC"), I respectfully submit the following comments regarding the Draft Environmental Impact Report ("DEIR") for the LAX Northside Plan Update ("Project").

The BAC was established in 1973 "to act in an advisory capacity to . . . the various agencies of the . . . City of Los Angeles in the encouragement and facilitation of the use of the bicycle as a regular means of transportation and recreation." Since adoption of the *2010 Bicycle Plan* by a unanimous vote of the Los Angeles City Council, the BAC has also been charged with monitoring the "progress of Bicycle Plan implementation." Policy 3.2.1. We take seriously our obligation to ensure that the 2010 Bike Plan and other policies and plans supporting bicyclists are fully implemented.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

LAXN-AL05-2
Comment:

The DEIR Must Analyze Potential Impacts to Applicable Bike Plans and Bicyclists
The purpose of the DEIR is to "inform LAWA, the City of Los Angeles, and the public about the significant environmental effects of the proposed Project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the proposed Project." (DEIR, p. ES-1.) The Initial Study for the Project concluded that it could have a potentially significant impact on "adopted policies, plans or programs regarding public

transit, bicycle or pedestrian facilities, or otherwise decrease the performance of those facilities." Thus, the DEIR must fully and carefully evaluate whether such conflicts actually exist and, if so, consider methods for mitigating those impacts.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. The Draft Environmental Impact Report *did* include analysis of transit facilities, bicycle facilities, and pedestrian facilities within the vicinity of the Project Site according to applicable guidelines, including the Los Angeles County Congestion Management Program and the Los Angeles CEQA Thresholds Guide.

The Los Angeles County Congestion Management Program (CMP) requires that a transit system analysis be performed to determine whether a project adds demand exceeding the available capacity of the transit system serving a project. Section 4.14.3.4.5 on page 4.14-88 of the Draft Environmental Impact Report summarizes the analysis of public transit according to the CMP criteria. It concludes that the Project would add approximately 211 morning peak hour transit trips and 267 afternoon peak hour transit trips, and that in year 2022 there would be residual transit capacity of approximately 2,107 transit patrons during the morning peak hour and 2,175 transit patrons during the afternoon peak hour. Therefore, the Project would not result in a significant impact on the regional transit system. The analysis is described in more detail in Chapter 9 of *Transportation Study for the LAX Northside Plan Update* (Gibson Transportation Consulting, Inc., May 2014), which is included as Appendix E to the Draft Environmental Impact Report.

The Los Angeles CEQA Thresholds Guide identifies four categories of potential impacts from construction, including loss of bus stops or rerouting of bus lines, which could significantly impact public transit. However, no existing or proposed public transit lines would be affected by construction of the Project, and therefore there would be no significant impacts to transit with respect to Project construction.

Page 4.14-90 of the Draft Environmental Impact Report summarizes potential Project impacts to pedestrian and bicycle traffic, based on the guidelines in the Los Angeles CEQA Thresholds Guide. It notes that the Project's access driveways would conform to City of Los Angles standards of design, including provision of adequate sight distance, crosswalks, and pedestrian movement controls to protect pedestrian safety. Further, the Project will comply with the City's bicycle parking ordinance and provide sufficient bicycle parking. Therefore, the Project would not increase pedestrian or bicycle hazards, and impacts to pedestrian and bicycle facilities would be less than significant.

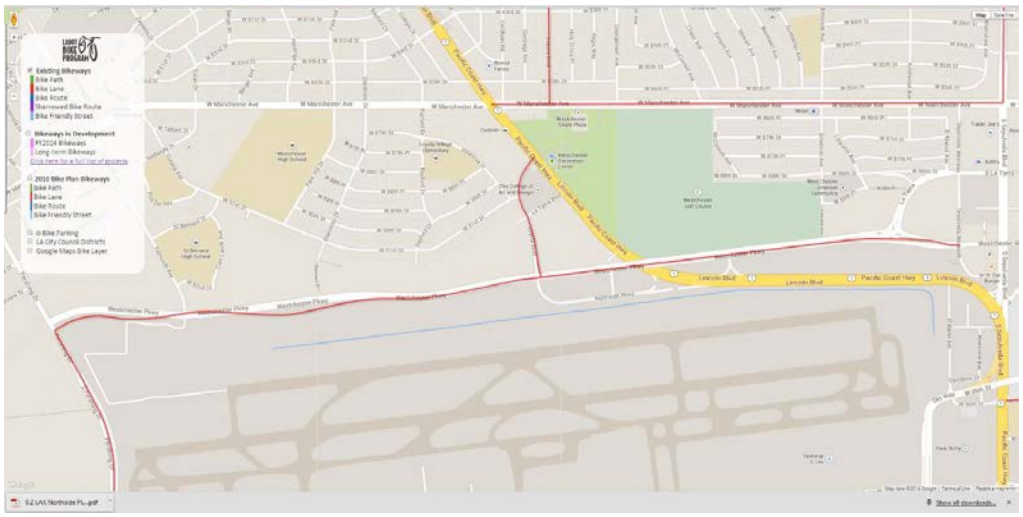
Therefore, the Draft Environmental Impact Report already contains the analysis and discussion requested in the comment. No significant impacts with respect to transit, pedestrian, or bicycle facilities were identified by the Project. Further, the Project has features to improve each of those three alternative travel modes. To improve transit in the area, the Project would dedicate space for a potential future transit station on the Project Site and would provide two additional buses to increase peak period frequency of Metro Route 115 on Manchester Avenue. To improve pedestrian and bicycle access, the Project includes a multi-modal recreation pathway for the entire length of the Project Site on the north side of Westchester Parkway. Additionally, the Project's transportation demand management (TDM) program would include features to promote bicycling and walking, such as exclusive access points, secured bicycle parking facilities or a bicycle valet system, a bicycle sharing or rental program, and showers.

LAXN-AL05-3
Comment:

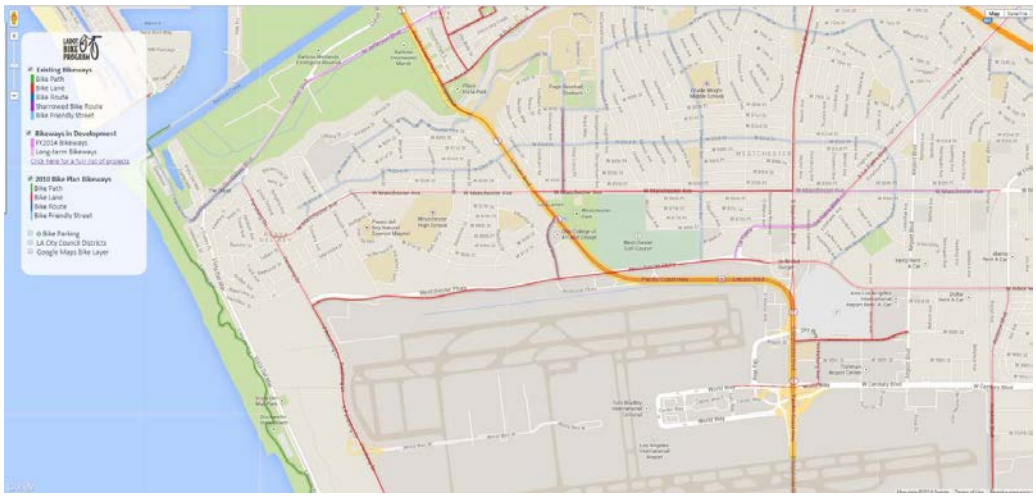
<u>The DEIR Fails to Identify, and Thus Fails to Analyze Potential Impacts on, Most Existing and Proposed Bikeways in the Vicinity of the Project</u>

To determine whether the Project conflicts with the 2010 Bike Plan regarding bicycle facilities, the DEIR must first correctly identify the existing and proposed bikeways in applicable plans. Because the DEIR does not do so, its analysis is by definition inadequate. Quite simply, the DEIR cannot evaluate impacts on bikeway projects that it does not acknowledge even exist.

The DEIR ignores most of the existing or potential on-street bikeways in the immediate vicinity of the project. According to the DEIR, "there are currently dedicated bicycle lane on Westchester Parkway and Pershing Drive adjacent to the Project Site." The map below, from the LADOT Bicycle Program website, http://www.bicyclela.org, shows that there are also existing bike lanes on Manchester Avenue and Loyola Drive adjacent to the Project Site.



The DEIR also states that "bicycle routes are proposed by the *2010 Bicycle Plan* on Loyola Boulevard and Emerson Avenue adjacent to the Project Site." This description omits most of the 2010 Bike Plan's proposed bikeways in the vicinity of the project. The map below shows "Bikeways in Development" and "2010 Bike Plan Bikeways" (http://www.bicyclela.org/fullscreenmap.html). LADOT is currently developing bikeways on La Tijera Blvd through and to the east of the project, and bikeways on Manchester Avenue east of Sepulveda (just outside the Project Area). In the future, bike lanes are proposed on Pershing Drive north of Manchester, on Lincoln Blvd (PCH), and Sepulveda Boulevard.



None of these proposed bike lane projects are mentioned, and the DEIR thus fails to consider whether the Project will have impacts on these bike facilities. That renders the DEIR legally inadequate.

Moreover, the 2010 Bike Plan proposes that Loyola Boulevard and Emerson Avenue be developed as Bicycle-Friendly Streets, not bike routes. A standard bike route consists of nothing more than signage, and does not reconfigure the roadway at all. Under the 2010 Bike Plan, a Bicycle-Friendly Street must "include at least two traffic-calming engineering treatments in addition to signage and shared lane markings" (2010 Bike Plan, p. 3-49). As part of the Neighborhood Network, these streets are intended to provide a comfortable riding experience for bicyclists of all experience levels, including children, women, families, young adults and seniors (in bike planning, these are sometimes referred to as streets for "8 to 80" year old bicyclists).

This distinction is critically important for analyzing the potential impacts of the Project. If analyzed as a "bike route," the question is whether the Project will prevent the City from installing "Bike Route" signs. In nearly every case, the answer would clearly be "no." If analyzed as a Bicycle-Friendly Street, the question is whether the Project might increase traffic volumes or vehicle speeds such that the street becomes less comfortable for an 8-year-old or 80-year-old bicyclist. Those are far different questions; the DEIR does not begin to address the latter, and thus is deficient.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

The comment is correct that the Draft Environmental Impact Report does not identify existing on-street bicycle lanes on Manchester Avenue and Loyola Boulevard. However, the lanes on Manchester Avenue are only adjacent to a small section of Area 12B, which is the existing Westchester Golf Course, and no changes are proposed to this Area as part of the Project. According to the website cited in the comment (www.bicyclela.org), the existing bicycle lanes on Loyola Boulevard were installed on May 20, 2014, 5 days after the release of the Draft Environmental Impact Report (May 15, 2014). Further, the discussion of existing conditions within the Study Area is intended to represent conditions at the time the Notice of Preparation (NOP) was filed on April 4, 2012.

The Draft Environmental Impact Report did refer to Emerson Street and Loyola Boulevard as being proposed for bicycle routes, rather than bicycle-friendly streets. However, these facilities have not been designed, scheduled, or funded for implementation on either

street, and it is impossible to know how those changes, if they are ever implemented, may affect vehicular traffic on those streets. In the case of Emerson Street, it is currently closed to through traffic and thus will not be affected by Project traffic. Loyola Boulevard is designated as a collector street, but is far wider than a typical collector with approximately 64 feet of pavement curb-to-curb (a collector is typically 48 feet wide). Unlike most of the streets that the *2010 Bicycle Plan* intends to add bicycle facilities to, Loyola Boulevard is wide enough to accept bicycle facilities and maintain vehicular capacity. The intersections of Loyola Boulevard & Westchester Parkway and Lincoln Boulevard & Loyola Boulevard are both projected to operate at LOS A or B during both the morning and afternoon peak hours under Future with Project with Mitigation Conditions (year 2022), as shown in Table 4.14-15 on pages 4.14-114 through 4.14-121. Therefore, even should the traffic speeds be increased or capacity on Loyola Boulevard be reduced to accommodate features of a bicycle friendly street, the traffic volumes on this street are light enough – even with proposed Project traffic added – to still operate at acceptable conditions. The proposed Project would not inhibit the ability to install features of a bicycle friendly street on either Loyola Boulevard or Emerson Street.

The City of Los Angeles has not established the types of impact criteria cited in the comment. As described in Section 4.9.3.3.1 of the Draft EIR, LAWA will comply with bicycle policies and plans in the vicinity of LAX. The Project site will not preclude the installation of bicycle facilities identified in the *2010 Bicycle Plan.* Further analysis or implementation of bicycle facilities is beyond the purview of this project.

LAXN-AL05-4
Comment:

<u>The DEIR Ignores The Project's Significant Impacts On Bicyclists Construction Impacts</u>
The DEIR fails to analyze the impacts that Project construction would have on bicyclists. For example, the DEIR states that the Project's primary haul routes are three streets with existing or under- development bike lanes: Manchester, Pershing and La Tijera (p. 4.14-44). Because the DEIR does not acknowledge the bike lanes on Manchester or La Tijera, or proposed lanes on Pershing north of Westchester Parkway, the DEIR cannot possibly have evaluated those impacts. Moreover, the DEIR states that construction likely will result in sidewalk and lane closures on Manchester and Lincoln Blvd, streets with existing or proposed bike lanes that the DEIR ignores. The street closures, in particular, will have a significant, adverse impact on bicyclists.

In Los Angeles, lane closures on streets with bike lanes typically involved closing the bike lanes themselves, and forcing bicyclists to ride in mixed-flow lanes with motor vehicles. On high-speed streets such as Manchester and Lincoln, that puts bicyclists in danger. Such closures often result in localized congestion, in which enraged motorists engage in aggressive, hostile driving. The DEIR says that unspecified "provisions would also be made to incorporate safety precautions for pedestrians and bicyclists . . . to the extent feasible." Through its lack of specificity, the DIER fails to provide bicyclists any assurance that the impacts on bicyclists will be mitigated.

A genuine mitigation measure would be specific. At a minimum, the DEIR must commit LAWA to the following during construction:

1. No bicycle lane will be closed, and no "shareable" lane will be narrowed, without full compliance with all state, federal and local regulations regarding closure of a bike lane, including all required temporary lane closure markings.
2. Whenever a bicycle lane is closed, it will be inspected multiple times per day to ensure that the lane closure is properly marked and signed.
3. To ensure that the bike lanes are closed properly, any permit for a lane closure should impose a penalty to be deposited into the City's Bicycle Plan Trust Fund.
4. When and where a bike lane is temporarily closed, a law enforcement officer will

be stationed at the location to ensure that motorists comply with all applicable provisions of the California Vehicle Code, including section 21760 (the Three Feet for Safety Act) and 21703 (safe following distance).

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

The comment erroneously states that the Project proposes a construction haul route on Manchester Avenue. As stated on page 4.14-44 of the Draft Environmental Impact Report, three primary haul routes were identified, including Pershing Drive to Imperial Highway to I-105, Sepulveda Boulevard to I-105, and La Tijera Boulevard to I-405. Figure 21 on page 275 of *Transportation Study for the LAX Northside Plan Update* (Gibson Transportation Consulting, Inc., May 2014), provided as Appendix E to the Draft Environmental Impact Report, graphically depicts these haul routes, and doesn't include traffic on Manchester Avenue. The comment states that La Tijera Boulevard has "existing or under development bicycle lanes." There are no existing bicycle lanes on La Tijera Boulevard, and though they are proposed as part of the City's *2010 Bicycle Plan*, they are not designed, scheduled, or funded and therefore it is unknown what effect their eventual implementation may have on La Tijera Boulevard. Regardless, haul truck traffic travels in vehicular travel lanes just like any other vehicle, and has no direct effect on bicycle traffic traveling in dedicated bicycle lanes.

The Draft Environmental Impact Report states, on page 4.14-44, "Construction on Areas 12B and Area 13 could require temporary sidewalk closures and lane closures on Manchester Avenue and Lincoln Boulevard, affecting pedestrians and transit operations." However, this was partially an oversight, as Area 12B is the existing (completed) golf course, which would not be modified as part of the Project, and therefore there would be no construction affecting Manchester Avenue. While temporary sidewalk closures and/or lane closures are possible on Lincoln Boulevard as a result of potential construction on Area 13, there are currently no bicycle lanes on Lincoln Boulevard. While *2010 Bicycle Plan* proposes to add bicycle lanes to Lincoln Boulevard, these facilities are not designed, scheduled, or funded and therefore it is unknown how potential construction could affect potential bicycle lanes. In any case, construction and associated sidewalk or lane closures would be temporary, and with the provision of the various features of the construction traffic management plan, would be less than significant. As described on pages 4.14-44 and 4.14-45 of the Draft Environmental Impact Report, and as noted in the comment, as part of the construction traffic management plan, provisions would be made to incorporate safety precautions for pedestrians and bicyclists. This includes meeting all applicable requirements regarding notice and signage marking bicycle lane closures and may include provision of additional safety features or law enforcement personnel if required by applicable statutes. The additional restrictions suggested by the commenter are not warranted given the less than significant impact on bicycle lanes.

LAXN-AL05-5
Comment:

Project Impacts
The Project is expected to generate nearly new 24,000 daily vehicle trips, with nearly all of those vehicles expected on streets designated for future bike lanes in the 2010 Bike Plan. (DEIR, pp. 4-14.48 & -49.) The City of Los Angeles has an abysmal record of installing bike lanes on major streets like Manchester, Lincoln and Sepulveda that are perceived by motorists as congested. Thus, adding tens of thousands of trips to streets near the Project will almost certainly have an adverse impact on the 2010 Bike Plan.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. The following streets are identified in the City's *2010 Bicycle Plan* for bicycle lanes in the vicinity of the Project Site: Sepulveda Boulevard, La Tijera

Boulevard, Lincoln Boulevard, Pershing Drive north of Westchester Parkway, Manchester Avenue west of Lincoln Boulevard, and Westchester Parkway east of Sepulveda Boulevard. It is important to note that the Project site does not conflict with any of these proposed bicycle facilities in the *2010 Bicycle Plan*, which is independent of the Project.

Based on a review of street widths, lane configuration, and on-street parking restrictions, each of those streets are likely to require the removal of on-street parking or a travel lane if bicycle lanes are to be accommodated (with the exception of Westchester Parkway east of Sepulveda Boulevard). As the comment notes, the removal of on-street parking or the removal of a travel lane (which significantly reduces vehicular capacity) require difficult implementation decisions, especially along commercially-developed arterials such as Lincoln Boulevard, La Tijera Boulevard, and Sepulveda Boulevard. These decisions must be faced with or without the addition of proposed Project traffic and the level of traffic added by the proposed Project is independent of that decision-making process.

These proposed bicycle in the vicinity of the Project have not yet been designed, scheduled, or funded for implementation. While Project traffic will necessarily increase both daily and peak hour traffic on those corridors, there is no reason to expect that this moderate increase in traffic volumes compared to what is already on the roadway system will make the implementation of bicycle lanes in the vicinity any less likely than under "without Project" conditions. The comment provides no evidence to support its claim.

The City of Los Angeles has established no standards by which to measure the potential impact of additional vehicular traffic on vehicular travel lanes to existing or potential future bicycle facilities. As described in Section 4.9.3.3.1 of the Draft EIR, LAWA will comply with bicycle policies and plans in the vicinity of LAX. The Project will not preclude the installation of bicycle facilities identified in the *2010 Bicycle Plan.* Therefore, the Project would not result in a significant impact to existing or future bicycle facilities.

LAXN-AL05-6
Comment:

<u>Because The Project Will Create More Than 24,000 Daily Vehicle Trips, It By Definition Has An Adverse Impact On Implementation Of The 2010 Bike Plan</u>
For example, under the 2010 Bike Plan and its accompanying Five-Year Implementation Plan, the City promised to evaluate and install 40 miles of bikeway projects each year. The Bike Plan was adopted more than 3½ years ago. Of the 40 miles included in so-called Year One projects, only 7.1 miles have been installed, less than 18%. No proposed Year One bike lane project has been installed anywhere near the Westside. The City has just begun its analysis of "Year Two" projects, and Westside elected officials have already declared that they oppose bike lane projects on Westside streets such as Westwood Blvd (connecting directly to UCLA) and 6th Street (connecting to LACMA, the La Brea Tar Pits, and future subway stations at Wilshire/La Brea and Wilshire/Fairfax.

In short, any City project that adds traffic to streets proposed for bike lanes must be considered to have a significant adverse impact on bicyclists, because the Project makes it significantly less likely that the bike lanes will be installed. It bears noting that this is an impact, and a problem, that is entirely of the City's own making. If the City had any sort of positive record of installing bicycle infrastructure along key corridors, despite modest increases in traffic delay for motor vehicles, LAWA might be able to argue that the increases in traffic volumes and traffic congestion that this project will create would not have an impact on the 2010 Bike Plan. But because the City has used "traffic congestion" as a mantra for failing to install bike lanes on nearly every street where they are proposed, the City and LAWA cannot deny that increased traffic volumes will have a significant, adverse impact on bicyclists.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for

review and consideration. The comment notes that, of the 40 miles of "Year One" projects in the *2010 Bicycle Plan*, only 7.1 miles have been installed, none on the Westside of Los Angeles. However, based on information from the LADOT Bike Blog (http://ladotbikeblog.wordpress.com/), many bicycle facilities have been installed since fiscal year (FY) 2011. In FY 2011, a total of 19.37 miles of bicycle lanes, 2.46 miles of bicycle paths, and 8.13 miles of sharrows were installed (for a total of 29.96 miles of new bicycle facilities). In FY 2012, a total of 50.54 miles of bicycle lanes, 4.00 miles of bicycle paths, and 21.36 miles of sharrows were installed (for a total of 75.90 miles of new bicycle facilities). In FY 2013, a total of 101.00 miles of bicycle lanes, 1.5 miles of bicycle paths, 22.8 miles of sharrows, and 0.8 miles of bicycle friendly streets were installed (for a total of 126.1 miles of new bicycle facilities). In FY 2014, based on latest data available, a total of 19.1 miles of bicycle lanes were installed. In total, over those 3 ½ years, over 250 miles of new bicycle facilities were installed throughout the City of Los Angeles. Therefore, while the facilities installed were not necessarily those that were first identified for implementation, far more than 40 miles of bikeway projects have been installed each year. It appears that the City has nearly doubled its goal of 40 miles per year to approximately 71 miles of new bikeway facilities per year.

The comment also suggests that any project that adds traffic to a street on the 2010 Bicycle Master Plan would, by definition, have an adverse impact on bicyclists. However, under the California Environmental Quality Act (CEQA), by definition, a Project must provide feasible mitigation when it would result in a significant impact (not an "adverse impact") on a facility based on established impact criteria. There are not, in fact, any established criteria for identifying a significant impact, as a result of a project's additional traffic on vehicular travel lanes, to existing or potential future bicycle facilities. Therefore, the Project cannot – by definition – have a significant impact on the *2010 Bicycle Plan*.

The proposed Project complies with the LAX Master Plan EIS/EIR Commitments, including LU-5: Compliance with the City of Los Angeles Transportation Element Bicycle Plan. This commitment requires LAWA to comply with bicycle policies and plans in the vicinity of LAX. The proposed Project also includes Project Design Features to support bicycling, including requiring bicycle facilities such as lockers and showers, and bicyle racks adjacent to walkways, near building entrances, intersections, transit stations, bus shelters, and any other pedestrian gathering areas at a maximum distance of 1,000 feet and in clusters of three, as noted in PDF LU-19 in the Draft EIR, Section 4.9.3.3.3. The proposed Project is consistent with the *2010 Bicycle Plan* as follows:

- Plan Purpose: "Increase, improve and enhance bicycling in the City as a safe, healthy, and enjoyable means of transportation and recreation." The proposed Project maintains the existing bicycle lane on Westchester Parkway while adding additional bicycle parking and providing space for recreational bikers on the
- Plan Goal: "Increase the number and type of bicyclists in the City." The proposed Project maintains the existing bicycle lane on Westchester Parkway and adds an additional 12-foot paseo that can be used by recreational bicyclists, thereby increasing the type of cyclists that can ride in the Project site vicinity.
- Plan Goal: "Make every street a safe place to ride a bicycle." The proposed Project maintains the existing bicycle lane on Westchester Parkway and adds an additional 12-foot paseo that can be used by recreational bicyclists, thereby maintaining existing and creating new safe places for cyclists to ride.
- Plan Goal: "Make the City of Los Angeles a bicycle friendly community." The proposed Project supports making the City of Los Angeles a bicycle friendly community by maintaining the bicycle lane on Westchester Parkway, adding a paseo where additional recreational cyclists can ride, and requiring bicycle parking.
- Objective 1.2: "Provide convenient and secure bicycle parking and support facilities citywide."

- Objective 1.4: "Encourage and facilitate bicycle riding as an important mode of personal transportation as well as a pleasant source of outdoor exercise." The proposed Project encourages and facilitates bicycle riding as a mode of personal transportation and exercise by maintaining the bicycle lane on Westchester Parkway, adding a paseo where additional recreational cyclists can ride, and requiring bicycle parking. As noted in Table 4.6-2 of the Draft EIR, the proposed Project will comply with the City of Los Angeles Green Building Code Tier 1 requirements, including requiring bicycle parking and changing rooms, short-term bicycle parking within 200 feet of visitors' entrance for 5% of visitor motorized vehicle parking with a minimum of one two-bike capacity rack, and long-term bicycle parking for buildings over ten tenant occupants for 5% of motorized vehicle parking capacity, with a minimum of one space.
- Objective 2.2: "Assure a safe bicycling environment for riders of all experience levels." The proposed Project maintains the existing bicycle lane on Westchester Parkway and adds a paseo that could be used for less experienced riders, thereby providing a safe environment for all riders and experience levels.
- Objective 2.3: "Design and maintain all streets so that they incorporate Complete Street standards." The proposed project maintains the existing bicycle lane on Westchester Parkway, maintains the existing sidewalk, and adds a pedestrian paseo that could be used by recreational cyclists, thereby incorporating "Complete Street" standards.
- The Bicycle Plan designates Westchester Parkway as a bicycle lane. The proposed Project maintains this designation and does not preclude implementation of other planned bicycle lanes.

While Project traffic will necessarily increase both daily and peak hour traffic on those corridors, there are already many vehicles on those streets prior to Project traffic. There is no reason to expect that this moderate increase in traffic volumes compared to what is already on the roadway system will make the implementation of bicycle lanes in the vicinity any less likely than under "without Project" conditions. However, this comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

LAXN-AL05-7
Comment:

The Project Will Have Significant Traffic Impacts On Streets With Existing Or Proposed Bikeways

The DEIR analyzes traffic impacts under the "LOS" standard that focuses solely on automobile traffic, and ignores bicyclists and pedestrians. Under this auto-centric standard, the Project will cause "significant traffic delay impacts at several intersections" (DEIR p. 4.14-80), including:

1. Lincoln Blvd and Venice Blvd (2010 Bike Plan includes bike lanes on Lincoln; existing bike lanes on Venice Blvd)
2. Lincoln Blvd and Mindanao (Lincoln is proposed bike route in Los Angeles County Bike Plan)
3. Lincoln Blvd and Fiji (Lincoln and Fiji are proposed bike routes in Los Angeles County Bike Plan)
4. Lincoln Blvd and Jefferson Blvd. (2010 Bike Plan includes bike lanes on Lincoln; bike lanes on Jefferson are currently in development per LADOT)
5. Lincoln Blvd and Manchester Ave (2010 Bike Plan includes bike lanes on both streets)
6. Sepulveda Blvd and Manchester Ave (2010 Bike Plan includes bike lanes on both streets)
7. Sepulveda and La Tijera (2010 Bike Plan includes bike lanes on both streets)

8. Sepulveda and Westchester Parkway (2010 Bike Plan includes bike lanes on both streets)
9. Sepulveda and i-105 westbound ramps (2010 Bike Plan includes bike lanes on Sepulveda)
10. Sepulveda and Imperial Highway (existing lanes on Imperial; 2010 Bike Plan includes bike lanes on Sepulveda)
11. Airport and Manchester (2010 Bike Plan includes bike lanes on Manchester)
12. Aviation/Florence and Manchester (just outside City of LA, in City of Inglewood, which has no bike plan, but LA 2010 Bike Plan has bike lanes on Manchester).
13. La Cienega and Florence (in City of Inglewood, which has no bike plan)
14. La Cienega and Manchester (in City of Inglewood, which has no bike plan)
15. Aviation and Arbor Vitae (2010 Bike Plan includes bike lanes on both streets)
16. La Cienega and Arbor Vitae (2010 Bike Plan includes bike lanes on Arbor Vitae)
17. La Cienega and Slauson (unincorporated Los Angeles County)

In short, at every intersection in the City of Los Angeles where the DEIR projects significant traffic impacts, at least one intersecting street (and often both) is designated for bike lanes in the 2010 Bike Plan. It is beyond question that projected traffic impacts make it significantly more difficult to obtain political approval to install bike lanes on these streets. That is a significant, adverse impact on bicyclists that is not mentioned, much less analyzed or discussed, in the DEIR.

The DEIR's proposed mitigation measures for motor vehicle traffic impacts would, in turn, have a significant adverse impact on bicyclists, both in their existing configuration and as proposed in the 2010 Bike Plan.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

While Project traffic will necessarily increase both daily and peak hour traffic within the Study Area, there are already many vehicles on those streets prior to Project traffic. There is no reason to expect that the Project's moderate increase in traffic volumes compared to what is already on the roadway system will make the implementation of bicycle lanes in the City or County any less likely than under "without Project" conditions.

Refer also to Response to Comments LAXN-AL05-3 and LAXN-AL05-5.

LAXN-AL05-8
Comment:

<u>By Increasing Traffic, The Project Will Make Streets Less Safe For Bicyclists, In Violation of the 2010 Bike Plan's Goal to Make Every Street a Safe Place to Ride a Bicycle</u>
The State of California and the City of Los Angeles have statutes, ordinances and policies declaring that bicyclists may ride on every street, including streets in the vicinity of the Project. Streets and Highways Code sec. 885.2 finds and declares that "the design and maintenance of many of our bridges and highways present physical obstacles to use by bicycles" and "the bicycle is a legitimate transportation mode on public roads and highways." California Vehicle Code section 21200 provides that "a person riding a bicycle . . . upon a highway has all the rights and is subject to all the provisions applicable to the driver of a vehicle, except those provisions which by their very nature can have no application." These state laws are embodied in the 2010 Bike Plan, which establishes the following goal: "Make every street a safe place to ride a bicycle." Thus, the issue for the DEIR to consider is not only whether the project has an impact on formally-designated bike infrastructure, but also whether any aspect of the Project, including proposed motor vehicle traffic mitigation measures, makes any area street a less safe place for bicyclists. If it does, the Project decreases the performance of the street for bicyclists.

Most Los Angeles streets do not have lanes that are wide enough to be safely shared by motorist and bicyclists. Bicyclist, thus, must "take the lane" and ride in mixed-flow traffic. When traffic volumes are low to moderate, motor vehicles can easily move into an adjacent lane to pass a bicyclist. There are often lengthy gaps between bunches of cars where no conflicts exist. As traffic volumes increase, the potential for cars to be "stuck" behind a bicyclist increases. That means increased aggressive and hostile driving near bicyclists, which makes the streets less safe for bicyclists and reduces the performance of the street for us.

On those streets with relatively wide curb lanes, bicyclists can (and usually do) attempt to share the travel lane with motorists, even if that requires bicyclists to ride in the "door zone" and/or weave in and out of parking lanes. Thus, any proposed modification to a street that makes it less "shareable" between bicyclists and motorists has an adverse impact on bicyclists.

The DEIR simply conducts the standard LOS analysis, but makes no effort to either quantitatively or qualitatively evaluate the impact on bicyclists of increased vehicle trips. In short, even if the LOS analysis shows no significant impact on motor vehicles, that does not mean that the Project will not have a significant impact on bicyclists, because the levels of congestion that make a street less comfortable and less safe for a bicyclist are lower. Moreover, the undisputed evidence regarding the City's failure to install on-street bikeways—not only since adoption of the 2010 Bike Plan but in the 37 years since adoption of the City's first bike plan in 1977—demonstrates that any increase in traffic volumes is highly likely to impact the City's willingness to install on-street bike infrastructure.

Response:

The City has no adopted standards for measuring a reduction in bicyclist safety due to increased traffic volumes in vehicular travel lanes, nor any impact thresholds by which to identify significant impacts. The safety of a bicyclist is more directly linked to the quality of the design of the bicycle lane itself rather than the number of vehicles per lane on the adjacent travel lanes. Therefore, the Project would not result in significant impacts to the *2010 Bicycle Plan*. On the contrary, the Project is adding bicycle and pedestrian facilities along its Westchester Parkway frontage and is adding bicycle parking and bicycle facilities on site, which would enhance safety.

Bicycle facilities along arterial and collector streets are installed at the discretion of the City Council and LADOT as per the elements of the *2010 Bicycle Plan*. The bicycle facilities called for in the *2010 Bicycle Plan* were not dictated by the levels of traffic on the roadway.

Refer also to Response to Comments LAXN-AL05-3 and LAXN-AL05-5.

LAXN-AL05-9
Comment:

<u>Many Proposed Traffic Mitigation Measures Will Adversely Impact Bicyclists</u>

Many of the traffic mitigation measures included in the DEIR will have an adverse impact on bicyclists.

1. At Sepulveda and Manchester, the proposed right turn lane would impact current bicyclists' ability to ride in the shoulder. Because it is unlawful for a bicyclist to ride straight through a marked right-turn lane, the proposed right turn lane would force bicyclists to "take" the full right lane while riding westbound. This will subject bicyclists to harassment. Looking to the future, any reconfiguration of roadway width to benefit motorists makes it exceedingly unlikely that the City will later configure the roadway to include bike lanes as called for in the 2010 Bike Plan.

2. At Sepulveda and La Tijera, adding a second left turn lane (and shifting all other westbound lanes northward to the curb) is entirely inconsistent with LADOT's current workplan that includes designing bike lanes for this stretch of La Tijera. Even if this bike lane project does not go forward, the "mitigation" removes a shoulder that can be used by bicyclists and curb parking that provides a buffer from traffic for sidewalk users.
3. At Sepulveda and Imperial Highway, there are existing bike lanes on Imperial Highway, and bicyclists proceeding west on Imperial Highway must ride across the right turn lane to proceed west. Creating a double-right turn lane makes conditions much less safe and much more difficult for bicyclists. From a review of Google Maps, it appears that this double right-turn lane already has been installed. Nevertheless, increasing the volume of right-turning vehicles, as the Project will do, will make this already-dangerous location even worse for bicyclists. The DEIR acknowledges that the bike lane must be shifted, but fails to acknowledge that this change exposes bicyclists to increased risks (p. 4.14-103).
4. At Airport Blvd and Manchester, the DEIR proposes significant reconfiguration of the lane alignments, without discussing how those changes might impact installation of bike lanes on Manchester. It seems likely that installing double-left turn lanes on the eastbound and westbound approaches will make it significantly more difficult to extend bike lanes through the intersection.

Simply, the DEIR is focused solely on ensuring that the Project does not make things worse for motorists, and ignores the fact that many of the proposed mitigations will make conditions worse for bicyclists.

These significant impacts on bicyclists can be mitigated. To mitigate the impact that increased traffic will have on implementation of bike lanes as called for in the 2010 Bike Plan, LAWA and the City must:

1. Make a binding commitment to installing bike lanes on all streets called for in the 2010 Bike Plan in the vicinity of the Project; fund and conduct all necessary environmental review for those lanes; and install the bike lanes.
2. Make a binding commitment to implement "Bicycle Friendly Street" projects on all streets designated as such in the 2010 Bike Plan, including Loyola Blvd., Emerson Ave., 83rd Street, Wiley Post Ave. and Will Rogers Street. The streets must have significant traffic calming features to ensure that they are comfortable for bicyclists of all ages and abilities. It is worth noting that these measures, called for in the Bike Plan, will address nearby residents' concerns about increased "cut through" traffic on their streets, because Bicycle Friendly Streets are specifically designed and intended to substantial reduce, if not eliminate, cut-through traffic.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. As described in Response to Comment LAXN-AL05-8 and others, the City has no adopted significance thresholds relating to impacts to bicyclists or potential future bicycle facilities, and therefore the Project would not have a significant impact on bicycle facilities. The Project cannot be required to "mitigate" impacts that exist without the Project or implement improvements for which there is no nexus to Project traffic. LAWA also cannot make a binding commitment on behalf of the City.

LAXN-AL05-10
Comment:

<u>The Project Fails to Propose Any Meaningful Integration of Bicycles Into Transit Access to The Project; The DEIR Fails to Discuss or Analyze This Issue.</u>
The 2010 Bike Plan includes Transit Objective 1.3: "Expand bicyclists' range and mobility options through the integration of bicycling into the region's transit system (Bike Plan, p.

4-79). Metro has adopted a "First Last Mile Strategic Plan and Planning Guidelines" (http://media.metro.net/docs/sustainability_path_design_guidelines.pdf). Here, the Project is relatively close to the under-construction Crenshaw/LAX light rail line, including stations at Florence/Hindry, Aviation/Century (also a Green Line Station), and an under-consideration additional station near Aviation/96th Street. While most of the Project area is outside the ½ mile walking catchment area surrounding these stations, the Project is within the 3-mile bicycle catchment area. The DEIR states that it will mitigate traffic impacts through a Transportation Demand Management (TDM) program that would, among other things, "promote bicycling and walking" (DEIR, p. 4.14-92). However, there is no indication that LAWA has given any consideration to improving bicycle access to the Project, particularly from transit stations, as called for by the 2010 Bike Plan and Metro planning documents.

To comply with these applicable policies and programs, LAWA must include:

1. Analysis, approval, funding and installation of high-quality bikeways between Crenshaw/LAX light rail stations and the Project. This would include proposed bike infrastructure on Manchester, Aviation and Arbor Vitae. High-quality bikeways would include a combination of off-road paths, cycle tracks and/or buffered bike lanes. At a minimum, LAWA and the City must install standard Class II bike lanes along at least one route connecting each light rail station to the Project.
2. Modification of proposed "paseo" along Westchester Parkway to include a paved bicycle path, or joint pedestrian-bike path.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. The Project includes a multi-modal recreational pathway located along the north side of Westchester Parkway within the Project Site. This pathway includes the existing 10-foot sidewalks and an additional 12-foot wide pathway of decomposed granite, which can be used by pedestrians and cyclists as well as scooters, strollers, etc. Additionally, Westchester Parkway already provides on-street bicycle lanes adjacent to the sidewalks, and with those included, the Paseo provides approximately 29 feet of non-motorized transportation capacity. The on-street bicycle lanes are paved, and therefore the second request found in the comment is already implemented.

With regard to the first request of the comment, that the Project provide "high-quality bikeways" along multiple miles of off-site roadways to reach potential future transit stations, this is well beyond the scope of any one project and not warranted by any impact of this project. As requested, a "combination of off-road paths, cycle tracks, and/or buffered bike lanes" would likely require substantial right-of-way acquisition from private owners as well as demolition of private property in order to provide the space for such a bikeway. The *2010 Bicycle Plan* proposes on-street bicycle lanes on Manchester Avenue, Arbor Vitae Street, and Aviation Boulevard which, if implemented by the City, would provide the connection between potential future transit stations and the Project.

LAXN-AL05-11
Comment:

<u>The Project's Numerous New Driveways Adversely Impact Bicyclists</u>
The Project includes several new driveways along Westchester Parkway, which currently has on-street bicycle lanes (DEIR, p. 4.14-43). A significant portion of bicycle collisions occur at driveways and intersections, and a significant percentage of collisions occur because motorists merge or turn into the bicyclists' path, or motorists' failing to yield to bicyclists. See, e.g., http://safety.fhwa.dot.gov/PED_BIKE/univcourse/pdf/swless04.pdf. Thus, by greatly increasing the potential conflict zones between motorists and bicyclist, the Project's design increases the risk of injury to bicyclists using the existing Westchester Parkway bike lanes, and decreases the performance of that facility for

bicyclists.

LAWA and the City must mitigate this significant impact, including by:

1. Redesigning the proposed Paseo to include a paved, off-road bicycle path and/or
2. Installing cycle tracks along Westchester Parkway.

While an unpaved Paseo could not be used by bicyclists riding road bikes or most hybrid bikes, they can be used by bicyclists riding mountain or BMX-type bicycles designed for off-road use. A substantial percentage of Los Angeles' bicyclists, particularly lower-income workforce cyclists, ride these types of bikes and can be expected to ride on the Paseo in any event. The Paseo should be designed to accommodate all bicyclists.

In addition, any casual observation of motorists exiting driveways in the City of Los Angeles reveals that a very large percentage of right-turning motorist never look to the right before crossing a sidewalk, bike lane or bike path. A significant percentage of motorists fail to slow, much less come to a required stop, before entering crosswalks. The DEIR indicates that some, but not all, of these new driveways and access points, would be "stop controlled," by which is presumably meant a stop sign. As noted, stop signs at driveways are meaningless to a significant number of motorists. To mitigate the impacts on bicyclists and pedestrians from these numerous new driveways, the Project should include engineering treatments—such as speed humps, speed tables, raised sidewalks, etc.—to ensure that motor vehicles enter and drive across pedestrian and/or bike facilities at a speed that is safe for active transportation users. LAWA's sole concern cannot be the efficient movement of cars as rapidly as possible.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. The Draft Environmental Impact Report examined potential impacts from Project driveways to bicycle facilities on page 4.14-90. As stated, the Project's driveways will be designed according to City of Los Angeles standards and guidelines, and would be reviewed for safety at that time. Westchester Parkway does not have sharp turns, steep grades, or other factors that could hinder safe driveway design. Sight distance will not be a problem for the same reasons. Therefore, Project access would not cause significant impacts to bicycle facilities and no mitigation is required.

The comment requests a redesign of the Paseo to include an off-road bicycle path in order to avoid conflicts with Project driveways that are inherent in the existing on-street bicycle lanes. However, the Paseo must cross the Project driveways just like the existing on-street bicycle lanes that it runs adjacent to. For this reason, the LAX Northside Plan Design Guidelines and Standards (Rios Clementi Hale Studios, May 2014) include Policy 5.2G.2, which limits the number of major access points on Westchester Parkway to enhance traffic flow and to reduce the disruption of landscaping, recreation paths, bicycle lanes, and medians. Therefore, providing off-street bicycle lanes on the Paseo as the comment requests would not solve its primary concern of potential conflict between bicycles and cars at driveways, since the Paseo also crosses driveways at the same points. It can be expected that the 22-foot wide Paseo adjacent to Westchester Parkway will provide key visual indicators to drivers exiting the driveways to watch for pedestrians and bicyclists.

LAXN-AL05-12
Comment:

<u>Because the City Has Not Provided On-Street Bike Infrastructure, All Sidewalks Must Be Designed to Accommodate Bicyclists</u>
According to the LA County Bike Coalition's 2013 Los Angeles Bicyclist and Pedestrian Count
(http://labike.org/sites/default/files/Websitefiles/LACBC%202013%20LA%20Bike%20Cou

nt%20Report.pdf), on streets without bike lanes approximately 50% of all bicyclists ride on the sidewalk. In the City of Los Angeles, bicycling on sidewalks is legal. Unless and until the City installs safe, high-quality on-street bike infrastructure, the City must ensure that sidewalks are designed to accommodate bicyclists. That means ensuring that sidewalks are wide enough to accommodate bicyclists and pedestrians together, and that curb cuts and "beg buttons" are positioned to accommodate bicyclists. The DEIR's proposed mitigation measures for motor vehicles includes reducing sidewalk widths at certain intersections, including Aviation and Arbor Vitae (DEIR, p. 4.14-103). If any aspect of the project affects the functionality of the sidewalks for bicyclists, that creates a significant impact that must be mitigated.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. As discussed above, the proposed Project does not have a significant impact on bicycle infrastructure and provides additional pedestrian and bicycle infrastructure in the form of the paseo, maintenance of the existing bicycle path along Westchester Parkway, and requirements for additional bicycle racks. The commenter's request for the proposed Project to design sidewalks to accommodate bicyclists exceeds the scope and impact of the proposed Project and is not warranted.

LAXN-AL05-13
Comment:

For all of the foregoing reasons, the proposed Project will create significant impacts for bicyclists and conflicts in numerous respects with the 2010 Bike Plan and other plans and policies designed to promote active transportation and make such travel modes safer. The DEIR fails to acknowledge, much less analyze, discuss and propose mitigation measures for bicyclists. If you have any questions or require clarification, please contact me at jeff.jacobberger@gmail.com or 323.646.3308.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. Please see responses to comments LAXN-AL05-02 through LAXN-AL05-12 for specific responses regarding the less than significant impacts to bicyclists and bicycle lanes, the *2010 Bicycle Plan*, and analysis of mitigation measures for bicyclists.

LAXN-AL06 **Cyndi Hench** **Neighborhood Council of Westchester Playa** **7/21/2014**

LAXN-AL06-1
Comment:

The Neighborhood Council of Westchester/Playa Board of Directors is writing to convey the support of the council and the Westchester/Playa stakeholders for the Los Angeles World Airport ("LAWA") Northside Project, as presented to the Board of Directors by Lisa Trifiletti, Airports and Facilities Planning, and her staff. LAWA, and in particular Ms. Trifiletti and her staff, have engaged in extensive community outreach and have endeavored to incorporate the wishes of the community with respect to the various uses and designs for the project. The Northside Project has been the subject of several of our Planning and Land Use Committee meetings, including an extensive meeting to review the draft Environmental Impact Report ("EIR") based upon that review we would like to make several formal comments upon the EIR:

Response:

This comment regarding the Neighborhood Council of Westchester/Playa Board of Directors' support of the proposed Project is noted for the record and will be forwarded to the decision-makers for review and consideration.

LAXN-AL06-2
Comment:

(1) That further study of the intersections located at Nicholson and Culver and analysis of the intersection at Culver and Vista del Mar be performed;

Response:

The Draft EIR traffic study did not include detailed analysis of the intersection of Vista Del Mar & Culver Boulevard. This intersection, while part of a major commuter route for north-south traffic along the coastline, is not expected to serve a material number of proposed Project trips. Any Project patrons approaching from, or departing to, the south via Vista Del Mar would use Imperial Highway and Pershing Drive to reach the Project Site. Any Project patrons approaching from, or departing to, the north via Culver Boulevard would either use Pershing Drive and Nicholson Street or Lincoln Boulevard to get to Culver Boulevard. In either case, they would bypass the intersection of Vista Del Mar and Culver Boulevard, and therefore no detailed analysis was considered necessary by LADOT, the City of Los Angeles' traffic experts.

Based on the analysis conducted in the traffic study, the intersection of Nicholson Street & Culver Boulevard would operate at level of service (LOS) A during the morning peak hour and LOS C in the afternoon peak hour under Existing with Project (year 2012) conditions, and at LOS B during the morning peak hour and LOS C during the afternoon peak hour under Future with Project (year 2022) conditions. These conditions are reported in Tables 4.14-9 and 4.14-11, respectively, in the Draft Environmental Impact Report. The comment suggests that these operating conditions do not match with existing conditions. During peak periods, there are significant amounts of congestion for vehicles approaching that intersection in the northbound direction. Vehicles traveling north on Pershing Drive often are stopped in a line of cars well in advance of reaching Nicholson Street, which is a short segment connecting Pershing Drive to Culver Boulevard. However, the intersection level of service analysis is based on the operation of the intersection itself, in isolation, rather than the approach. At the intersection of Nicholson Street & Culver Boulevard, nearly all of the vehicles approaching via Nicholson Street turn right onto Culver Boulevard. This right-turn movement is uncontrolled – there is a free flow of right-turning traffic from Nicholson Street to Culver Boulevard, and there is an exclusive lane for those turning vehicles on Culver Boulevard for approximately 550 feet before they are required to begin merging into the main flow of traffic (Culver Boulevard provides two lanes in the eastbound direction). Therefore, these vehicles do not affect the calculation of the intersection's volume-to-capacity (V/C) ratio and the resulting LOS. The LOS is instead calculated based on the traffic on Culver Boulevard and the small number of cars making left turns from Nicholson Street to westbound Culver Boulevard.

It should be noted that this intersection experiences heavy directional traffic, as indicated by the Existing (year 2012) condition peak hour traffic volumes shown in Figure 4 on page 29 of the traffic study. During the morning peak hour, the northbound right-turn from Nicholson Street is 1,144 cars and the eastbound through movement on Culver Boulevard is 1,260 vehicles, compared to 350 westbound through trips and 270 westbound left-turn trips. In sum, this shows a heavy northbound and eastbound flow of traffic during the morning peak hour. In contrast, during the afternoon peak hour, the northbound right-turn from Nicholson Street is 453 vehicles and the eastbound through movement is 557 vehicles, while the westbound through movement is 1,035 vehicles and the westbound left-turn movement is 864 vehicles. This shows a heavy southbound and westbound flow during the afternoon peak hour. This is important to note, because the Project, as a primarily commercial development (as opposed to a residential development), generates primarily inbound trips during the morning peak hour and primarily outbound trips during the afternoon peak hour. Project trips passing through the intersection of Nicholson Street & Culver Boulevard travel north and east when leaving the Project Site, and west and south when arriving to the Project Site. This is opposite the

peak directions of traffic at that intersection, and therefore the Project traffic's effect on congestion in this corridor is limited and less than significant.

Regarding the actual traffic conditions noted in the comment at the intersection of Nicholson Street & Culver Boulevard, the congestion experienced on Pershing Drive as drivers approach Nicholson Street is a condition caused by the merging of two northbound lanes down to one northbound lane on Pershing Drive. As soon as those two lanes of traffic merge into one, the single resulting lane moves relatively freely, since virtually all of that traffic subsequently makes an unimpeded right-turn onto Culver Boulevard into an exclusive lane. The solution to the existing congestion brought on by the merging of two lanes into one on Pershing Drive would be to eliminate the merge – this would require extension of two-lane operations all the way onto Culver Boulevard. However, this potential improvement is beyond the scope of the proposed Project and is not warranted by the proposed Project's impact at this location. In addition, the potential improvement is also physically infeasible. It is physically infeasible because Nicholson Street winds around a narrow hillside, with a steep drop on the north and a steep rise on the south, both sides of which would require an expansion of the street into private residential property. Further, turning two lanes onto Culver Boulevard would likely require widening into the Ballona Wetlands, a protected area. The improvement would also be less desirable to the local community, because such an improvement would make Pershing Drive to Nicholson Street to Culver Boulevard (and the reverse) a much more attractive route through the area than it is today, attracting many more commuters through Playa Del Rey. Based on public meetings with area residents, most are not in favor of providing additional capacity to ease congestion caused by commuters passing through the neighborhood, and therefore any improvement to ease this existing congestion would be counterproductive as far as the area residents are concerned.

LAXN-AL06-3
Comment:

(2) That signage with directions to the freeway and beach on the north corner of Falmouth and Manchester be installed in order to limit people attempting to drive through the neighborhood;

Response:

The proposed Project does not significantly impact the intersection of Falmouth Avenue and Manchester Avenue. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.
This particular movement is not one that the Project will add traffic to and therefore the suggested sign is not connected to Project impacts. The comment and the suggestion will be passed on to LADOT for their consideration.

LAXN-AL06-4
Comment:

(3) That the buses purchased for Route 115 travel the long route and not the short route;

Response:

The comment requests that the two buses proposed to be provided for Metro Route 115 as Project mitigation should travel on the long route, which includes Manchester Avenue west of Sepulveda Boulevard, rather than the short route which ends at Sepulveda Boulevard. This request will be conveyed to Metro upon acquisition of the buses.

LAXN-AL06-5
Comment:

(4) That analysis of Route 3 along Lincoln Boulevard be performed and further study of the intersections to determine if the addition of buses on this route will mitigate traffic issues;

Response:

Santa Monica Big Blue Bus (BBB) Route 3 was analyzed during development of the

Project's traffic study. It was determined that the addition of capacity to that route would not result in the reduction of significant impacts (from the three impacts identified under Existing with Project with Mitigation (year 2012) conditions and the four impacts identified under Future with Project with Mitigation (year 2022) conditions). On 6-lane arterials like Lincoln Boulevard and Sepulveda Boulevard, a bus reducing traffic by 33 trips per hour can be expected to reduce the volume-to-capacity (V/C) ratio at an intersection by approximately 0.008 (that is, less than 1% of capacity). This amount of improvement would not reduce any of the significant intersection impacts below the level of significance. Further, only one of the remaining significantly impacted intersections that is along BBB Route 3 (#8, Lincoln Boulevard & Jefferson Boulevard) has a small enough incremental increase in V/C ratio due to Project traffic that buses could potentially mitigate it. However, this increment, at 0.022 during the afternoon peak hour, would require the addition of at least four buses in the same direction during the afternoon peak hour (because Lincoln Boulevard provides 8 lanes – 4 in each direction – at that location, the bus would only reduce the V/C ratio by 0.060). Provision of 4 additional buses for one direction of travel to mitigate a single intersection impact is not only impractical, it is financially unreasonable. Further, the intersection in question is projected to still operate at LOS C under Future with Project with Mitigation (year 2022) conditions, which is an acceptable level of service according to City standards. Therefore, no additional analysis is required because the analysis has been performed and included in the Draft EIR, and already shows that the provision of additional buses for BBB Route 3 would not be effective at reducing the remaining Project significant impacts.

LAXN-AL06-6
Comment:

(5) That Playa Vista be included in the mentions of related projects in the draft EIR. Playa Vista is not mentioned in the related projects of the draft EIR, but should be mentioned;

Response:

The comment requests that Playa Vista be included in the Project traffic analysis as a related project. The LAX Traffic Model was developed with traffic from known developments, including Playa Vista, built in. It also included additional growth from development that has not yet been proposed, but is likely to occur based on long-term growth projections. Because of this, as described in detail in Response to Comment LAXN-AL07-8, the Project traffic study already took into account traffic from Playa Vista through the use of the LAX Traffic Model to forecast Future without Project (year 2022) conditions. The LAX Traffic Model was based on the Southern California Association of Governments long-range travel demand forecast model which was in turn based on the long-range land use plans approved by each member jurisdiction. Thus the region's long-range related projects are already incorporated in the model used in the LAX Northside analysis, and no further analysis is needed because Playa Vista has been considered.

Section 3.4 Related Projects; 4.8.4.1.1 Surface Water; 4.8.4.1.2 Groundwater; 4.8.4.2.1 Surface Water; 4.8.4.2.2 Groundwater; 4.9.4 Cumulative Impacts; 4.10.3.2 Ground-Borne Vibration; 4.15.4.2.1 Water Supply; 4.15.4.4.1 Electricity; 4.15.4.4.2 Natural Gas; and the related projects list, included as Table 9 of the traffic study (*Transportation Study for the LAX Northside Plan Update,* Gibson Transportation Consulting, Inc., May 2014, provided as Appendix E to the Draft Environmental Impact Report) of the Draft EIR has been revised to include Playa Vista as a related project, correct the total number of projects, and include Playa Vista as a related project for purposes of cumulative analysis. The addition of Playa Vista as a related project does not change any conclusions in the Draft EIR. Please see Chapter 3.0 of the Final EIR for Corrections and Additions to the Draft EIR.

LAXN-AL06-7
Comment:

(6) That the project descriptions for the LAX Northside Campus District at page 2-13 and

the LAX Northside Center District at page 2-14 be corrected, as they are currently reversed.

Response:

The project descriptions for the LAX Northside Campus District and the LAX Northside Center District have been corrected. Please see Chapter 3.0 of the Final EIR for Corrections and Additions to the Draft EIR. This inadvertent error occurred in one place in the Draft EIR, however the locations of the LAX Northside Center and Campus Districts were accurately described elsewhere and accurately displayed on exhibits throughout the document. This correction does not result in any changes to the Draft EIR conclusions.

LAXN-AL06-8
Comment:

(7) That the EIR include a proposed consolidated transportation management organization ("TMO"). The TMO would act as a proactive organization so that building owners, employers, local government representatives and others can work together and collectively establish policies, programs and services to address local transportation problems. A consolidated TMO would allow for coordination of services like shuttle service, vanpools, ridesharing, and use of public transportation services;

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. LAWA is voluntarily committed to the formation of a Transportation Management Organization (TMO) as an integral part of its TDM Program. Because a Project TMO needs a critical mass of participants to be effective, the formation of the TMO would occur in the second phase of Project development. However, every business entering the Project would be required to participate in, and pay dues to, the Project TMO at the time of its formation. When the Project reaches approximately 55% of its buildout development level (1,400 afternoon peak hour tips), the TMO would be formed and a Board of Directors selected from Project businesses. The transportation program to be supported by the TMO would be selected and priced and the TMO would begin collecting dues from its members based on the number of on-site employees or peak hour trips generated by each business. The TMO would take over the implementation, operation, and expansion of the TDM Program and would seek to implement transportation improvements too large for individual businesses to implement.

Once established, the Project TMO would invite Westchester businesses to join so that a subregional TMO could be formed to take on the larger transportation issues facing the Westchester area. Residents, too, could participate in the services offered by the TMO, which would include ride matching for carpools and vanpools, transit information, and more. As stated above, the TMO is a voluntary commitment by LAWA to expand the reach of the TDM program (which is itself a mandatory Project mitigation measure) by opening it up to other area businesses and residents. It has been added as Project Design Feature (PDF) T-17.

LAXN-AL06-9
Comment:

(8) That a below ground storm water treatment plant be constructed in Area 1;

Response:

As noted in Section 2 Project Description of the Draft EIR, Area 1 is designated for Open Space and Recreation land uses and below-grade stormwater treatment facilities are allowed in this land use category (Table 2-2 and Figure 2-5). LAWA continues to coordinate with LABOS and the FAA to enable development of Area 1 with a stormwater treatment facility and open space that complies with FAA requirements regarding revenue diversion. On August 25, 2014 LAWA signed a Letter of Intent with the City of Los Angeles Bureau of Sanitation to jointly develop facilities at the Project site designed to minimize the discharge of pollutants to Santa Monica Bay through stormwater runoff. On

November 6, 2014 the LAWA Board of Airport Commissioners authorized the Executive Director to execute a Memorandum of Understanding between the City of Los Angeles Department of Public Works, Bureau of Sanitation and the City of Los Angeles Department of Airports for the preparation of design and environmental documents for the proposed Argo Drain Sub-basin and the Hyperion connection which includes a new high-flow diversion structure to divert LAWA's stormwater runoff in the Imperial/Pershing Sub-basin to the Hyperion Treatment Plant. The City of Los Angeles Board of Public Works authorized the Director of Bureau of Sanitation to execute the Memorandum of Understanding on November 19, 2014. The Argo Drain Sub-basin Facility would be located generally underground and could potentially allow open space uses to be developed on the surface at the Project site. The proposed Project sets the regulatory framework that would allow these uses to be developed. Any such project would be subject to further review and approval under the CEQA.

No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-AL06-10
Comment:

(9) That Westchester Golf Course be upgraded to a regulation par 72 course; and

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. Although the proposed Project does not preclude it, upgrading of the Westchester Golf Course is not part of the proposed Project.

No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-AL06-11
Comment:

(10) Should the neighborhood north of the project to Manchester, between Sepulveda Westway and McConnell choose to seek permit parking due to parking issues created by the project, the study necessary to obtain the parking permits would be paid for by LAWA.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. As noted in Section 2.6.2 Community Compatibility, Urban Design Guidelines, and Sustainability of the Draft EIR, the proposed Project objectives include minimizing parking and traffic impacts on neighboring residential communities. The proposed Project meets this objective. The proposed Project includes Project Design Feature (PDF) Land Use (LU)-22, which requires parking spaces to conform to the standards set forth in the provisions of Los Angeles Municipal Code Section 12.21.A.4. Additionally, as noted in Section 4.14.3.1.7 Parking of the Draft EIR, the proposed Project's potential parking impacts were assessed by estimating the amount of parking required by LAMC for the proposed uses. During construction, an adequate number of parking spaces for construction workers would be available at all times on the Project site, and therefore no parking within neighborhoods is anticipated (Section 4.14.2.4.1 Construction of the Draft EIR). During operation, because the amount of parking for the commercial land uses will meet or exceed the LAMC requirements, and the recreational land uses will be using the ample parking of the office and research and development uses, the proposed Project will not have any significant parking impacts (Section 4.14.3.4.7 Parking of the Draft EIR). Because the proposed Project does not have significant impacts on parking, LAWA is not required to provide mitigation, including

payment for a parking permit study.

Although the proposed Project does not have significant impacts on parking, LAWA will make the following additional project commitment as a Project Design Feature:

- **PDF T-15:** Once 50% of Area 11 and Area 12 are occupied on a square foot basis, LAWA will conduct a parking study to evaluate potential parking impacts of the proposed Project. Should significant parking impacts be found at that time, LAWA will mitigate them to a level less than significant.

Please see Chapter 3.0 of the Final EIR for Corrections and Additions to the Draft EIR.

LAXN-AL07 **Barbara Lichman** **Culver City** **7/25/2014**

LAXN-AL07-1
Comment:

The following constitutes the comments of the City of Culver City ("Culver City") concerning the Draft Environmental Impact Report ("DEIR") for the Northside Plan Update ("Project"). As a threshold matter, please be advised that Culver City appreciates the efforts by Los Angeles World Airports ("LAWA") to open a dialogue with communities surrounding Los Angeles International Airport ("LAX") concerning impacts of the more than two million square feet of new development in the Northside Project on those communities, both independently, and when taken together with plans for development in and around LAX, itself. Nevertheless, Culver City maintains some serious concerns about the scope, depth and conclusions of the DEIR's air quality, traffic and transit analyses, because they omit any assessment of the Project's impacts on Culver City, defining Culver City outside the geographic scope of the Project's environmental effects even though the City is located only two miles from the Project site.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. Section 4.2 Air Quality of the Draft EIR evaluates regional and localized air quality impacts and project related health risk impacts for the South Coast Air Basin, which includes Culver City. Additionally, Section 4.14.2.2.1 Existing Transportation System describes existing transit in Culver City, Section 4.14.2.2.2 Existing Traffic Conditions describes intersections in Culver City included for traffic analysis. The results of these analyses are presented in Table 4.14.-9 Existing With Project Conditions (Year 2012) Significant Impact Analysis, Table 4.14.11 Future With Project Conditions (Year 2022) Significant Intersection Impact Analysis, Table 4.14.14 Existing With Project With Mitigation (Year 2022) Intersection Peak Hour Level of Service, and Table 4.14.15 Future With Project With Mitigation (Year 2022) Intersection Peak Hour Level of Service.
The Draft EIR air quality analysis appropriately defined the geographic extent of the analysis based on SCAQMD Modeling Guidance[14] and identified maximum impacted receptors appropriately based on SCAQMD Modeling Guidance[15]. The CO Hotspot analysis was based on the geographic extent defined in the traffic analyses (Draft EIR Section 4.14) which includes Culver City. The air quality analysis does not exclude Culver City outside of the scope of the analysis. For example, there are ten Culver City intersections evaluated in the air quality section as part of the CO Hotspots analysis. The comment does not otherwise raise any specific issue regarding the air quality analysis and, therefore, no more specific response can be provided or are required. Responses to specific comments are addressed below.

[14] SCAQMD Modeling Guidance for AERMOD. Available at http://www.aqmd.gov/home/library/air-quality-data-studies/meteorological-data/modeling-guidance. Accessed: August, 2014.
[15] Ibid

LAXN-AL07-2
Comment:

I- THE SCOPE OF THE DEIR AIR QUALITY ANALYSIS IS IMPERMISSIBLY NARROW.
It is Culver City's understanding, based on the DEIR, that the estimated operational emissions of volatile organic compounds ("VOCs") and nitrogen oxide ("NOx") from Project related stationary sources, such as building energy use, landscaping equipment, consumer products and architectural coatings, DEIR § 4.2.3.1.1, p. 4.2-18, and off-site emissions from onroad mobile sources, including motor vehicles bringing employees to work, Id., are greater than the significance thresholds, see DEIR, § 4.2.3.4.1, p. 4.2-38, established by the Southern California Air Quality Management District ("SCAQMD") in its 2012 Air Quality Management Plan ("AQMP"), DEIR, § 4.2.2.1.3, p. 4.2-9, for both of which pollutants the South Coast Air Basin was in nonattainment status as of December 28, 2012. DEIR, § 4.2.2.1.1, Table 4.2-2.

Response:

The comment summarizes the results of the Draft EIR air quality analysis, but incorrectly references significance thresholds from the 2012 AQMP. The comment addresses a general subject area (i.e., operational mass emissions), which received extensive analysis in the Draft Environmental Impact Report ("EIR") in Section 4.2, Air Quality. The comment does not raise any specific issue regarding the analysis and, therefore, no more specific response can be provided or is required. The analysis in the Draft Environmental Impact Report ("EIR") in Section 4.2, Air Quality, is based on the significance thresholds set by the SCAQMD independently from the 2012 AQMP (see Section 4.2.3.2).[16]

LAXN-AL07-3
Comment:

A. The Application of the Air Quality Standards Established in an Unapproved AQMP Renders the DEIR's Conclusions Questionable.
The DEIR employs the standards established in the SCAQMD's 2012 AQMP, which the DEIR states was approved by SCAQMD's Board of Governors on December 7, 2012. DEIR, §4.2.2.13, p. 4.2-9. The DEIR does not similarly state that the 2012 AQMP had been approved by the Federal Environmental Protection Agency ("EPA") during the analytic period encompassed by the DEIR. This absence of requisite EPA approval leaves open the question of the Project's compliance with the previously approved, and apparently still applicable, prior AQMP, or any alternative standard applicable in the absence of an approved AQMP. Without such analysis under the applicable standard, the DEIR cannot be considered adequate.

Response:

The comment has incorrectly assumed that the standards relied upon in the Draft EIR Air Quality analysis are established by the 2012 AQMP. The section cited by the comment is the "Environmental Setting" and "Regulatory Framework" description in the Draft EIR. This discussion does not establish the standards by which the Draft EIR has analyzed the Project. The analysis in the Draft Environmental Impact Report ("EIR") in Section 4.2, Air Quality, is based on the significance thresholds set by the SCAQMD independently from the 2012 AQMP (see Section 4.2.3.2).[17] Thus, the concerns expressed by the comment are not relevant to the Draft EIR analysis.

The comment is incorrectly concerned about the Draft EIR's adequacy relative to the status of the 2012 AQMP. While the 2012 AQMP currently has not been approved by the USEPA, it is the adopted AQMP by SCAQMD. Thus, for purposes of CEQA (a California law), it is appropriate for the Draft EIR to evaluate consistency with the 2012 AQMP, as is done in Section 4.11. For mixed-use developments such as the Project, the general

[16] Available at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook. Accessed: August, 2014.
[17] Available at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook. Accessed: August, 2014.

approach established by SCAQMD in the AQMP to evaluate the growth of emissions in the Southern California Air Basin accounts for the Project's emissions provided the Project's growth is a subset of the assumed growth in the AQMP. The AQMP relies upon growth estimates by the Southern California Association of Governments (SCAG), who is the entity that estimates the primary emissions from land development projects (i.e., traffic related emissions) for incorporation into the AQMP. These growth assumptions typically do not spell out specific projects by name. Section 2 of the SCAG 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) incorporates the Regional Housing Needs Assessment (RHNA) housing targets for the SCAG region and illustrates where new housing growth can be accommodated in the future. As discussed in Section 4.11 (Table 4.11-13 on Draft EIR p. 4.11-24), the Project does not contribute to direct population growth in excess of RHNA, and is thus consistent with the 2012 SCAG RTP/SCS. Furthermore, the 2012 SCAG RTP/SCS estimates a future employment growth of 4.2 million jobs for the life of the 2012 RTP/SCS.[18] The Project is expected to result in a net increase of 2,178 full-time equivalent jobs (see Draft EIR Table 4.11-10), or less than 0.05 percent of the total job growth for the region. This level of employment growth is consistent with the forecasts adopted by SCAG and thus the 2012 AQMP. In addition, the Project is an in-fill development that would advance many of the long-term planning and transportation goals of the SCAG RTP/SCS and SCAQMD AQMP. Thus, the Project is consistent with the 2012 AQMP, which is the appropriate AQMP when evaluating consistency with a local air quality plan since AQMD has adopted it.

LAXN-AL07-4
Comment:

B. The DEIR's Analysis of Cumulative Operational Emissions Lacks Analytic Support.
While the DEIR refers to Table 4.2-13 as demonstrating that "operation of the proposed project would exceed the project specific significance thresholds for VOC and NOx," DEIR, § 4.2.4, p. 4.2-44, and, on that basis, reaches the conclusion that "the proposed project would have a cumulatively considerable contribution for operational emissions and would result in cumulatively significant operational impact," Id., Table 4.2-13 does not illustrate those conclusions. That Table is not concerned with operational emissions, but rather graphically illustrates "Cumulative Construction Projects Peak Daily Emissions Estimates." It is, therefore, impossible to determine whether the conclusions articulated in § 4.2.4 concerning the Project's cumulative air quality impacts are in fact accurate.

Response:

The comment correctly identifies a problem with the table referenced in the Draft EIR section 4.2. What is referred to as Table 4.2-13 should be Table 4.2-9. This table illustrates the operational mass emissions of the Project as discussed in the text. This reference has been corrected and is included in the Final EIR Corrections and Additions. With this clarification, the results discussed in the text are supported.

LAXN-AL07-5
Comment:

C. Even The DEIR's Analysis of Cumulative Construction Emissions is Incomplete.
In Table 4.2-13, note 12, the DEIR explains that its analysis of cumulative construction emissions was based on the "LAX Master Plan Alternative D/SPAS Alternative 3," not on the project approved by the Los Angeles City Council, the combination of Revised SPAS Alternatives 1 and 9. The DEIR provides the rationale that the Federal Aviation Administration's ("FAA") required approval (of funding for the more recently approved project in the SPAS Report) had not yet been obtained. This requirement for FAA approval raises two potential issues related to air quality.

[18] SCAG, 2011. 2012 Regional Transportation Plan/Sustainable Communities Strategy. December Page 9. Available at: http://rtpscs.scag.ca.gov/Documents/2012/draft/2012dRTP_ExecSummary.pdf. Accessed: August, 2014.

First, approval by the FAA must be predicated upon the Project's "conformity" with the air quality standards set forth in the Clean Air Act, 42 U.S.C. § 7506, et seq., and in its implementing regulations, 40 C.F.R. § 93.100, et seq., Determining Conformity of Federal Actions to State or Federal Implementation Plans (collectively "Conformity Rule"). The DEIR omits any analysis of the Project's conformity, and instead chooses to employ as a surrogate project Alternative D from the 2005 Master Plan, that has long since been superseded by a vastly different project, implicating a vastly different set of activities, with concomitantly different air quality impacts, already approved by the City Council. No analysis of the cumulative impacts of the approved project, composed of a combination of SPAS Alternatives 1 and 9, is extant in the DEIR.

Second, even if Alternative 3 were still the applicable project, which it is not, Alternative 3 of the Master Plan never achieved Clean Air Act conformity in its entirety. It was only by virtue of a Stipulated Settlement of legal action brought by some of the same petitioners, e.g., City of Inglewood, City of Culver City and Alliance for a Regional Solution to Airport Congestion ("ARSAC") that parts of Alternative 3 approved in the Settlement (see Definitions and Section V.D.I) have proceeded as far as they have. The remainder, the "Yellow Light" projects, see Stipulated Settlement, § V.D., were replaced by the different project approved through the SPAS process, i.e., Alternatives 1 and 9. Therefore, the DEIR's reliance on Alternative 3 for its cumulative analysis of construction impacts must lead inevitably to a result of nonconformity. The analysis should, instead, be performed using the activities and timeframes planned for the current approved SPAS project, which may lead to a different, and more legally acceptable, result.

Response:

The comment raises concerns over the cumulative analysis, which received extensive analysis in the Draft Environmental Impact Report (“EIR”) in Section 4.2, Air Quality (Section 4.2.4). The cumulative analysis was based on the available information at that time.

The LAX Specific Plan Amendment Study (SPAS) is a separate and independent project from the proposed Project. At the April 30, 2013 City Council meeting, the City Council took the following actions relative to the SPAS.

“… the staff-recommended alternative as the best alternative to the problems that the Yellow Light Projects were designed to address, subject to future detailed planning, engineering, and project-level environmental review, such as project-level review of individual improvements under the California Environmental Quality Act (CEQA) and evaluation and approval processes of the Federal Aviation Administration (FAA). Approval of the staff-recommended alternative would provide the platform from which the specific details of the proposed improvements would be further defined and evaluated in connection with current and future FAA standards.”

The action by the City Council did not modify the existing LAX Master Plan, but rather selected a SPAS alternative for advancement to further planning, engineering, and project-level environmental review, including the evaluation and approval processes of the FAA. The FAA’s evaluation includes environmental review pursuant to the National Environmental Protection Act (NEPA). LAWA has not requested the initiation of NEPA analysis or project-level CEQA analysis for any of the SPAS projects.

Because the LAX Master Plan was not amended or superseded by the City Council actions in 2013, the cumulative analysis incorporates the construction emissions based on the “LAX Master Plan Alternative D/SPAS Alternative 3 as a conservative estimate for the potential construction emissions.

This approach is consistent with the CEQA guidelines for estimating cumulative impacts (California Code of Regulations §15130).

While the comment references the Project in relationship to the "conformity" concerns, it appears that the comment is actually referring to the LAX Master Plan Alternative D/SPAS Alternative 3 conformity status as discussed in Table 4.2-13 of the Draft EIR. Thus, the comment has not raised a substantive issue regarding the LAX Northside Project. The Project's cumulative analysis is based on the best available information for the related projects. The LAX Northside Draft EIR does not include a conformity analysis, nor is it required to, for either LAX Master Plan Alternative D/SPAS Alternative 3 or the LAX Northside Project. The General Conformity Rule is a provision of the Clean Air Act that requires federal actions conform to the appropriate state, tribal, for federal implementation plan for attaining clean air. The General Conformity Rule ensures that actions taken by *federal agencies* (emphasis added) in nonattainment or maintenance areas do not interfere with the state strategies for meeting the NAAQS, and is commonly evaluated as part of National Environmental Policy Act (NEPA) requirements. Thus, the LAX Northside Project will evaluate Project conformity as part of NEPA requirements, as necessary. The LAX Northside Draft EIR has evaluated the air quality issues as required by the California Environmental Quality Act, therefore, no more specific response can be provided or is required. The use of the SCAQMD thresholds for the project and cumulative analyses is consistent with the requirements of CEQA. (See *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899; see also Citizens for Responsible Equitable Environmental Development v. City of Chula Vista (2011) 197 Cal.App.4th 327.)

LAXN-AL07-6
Comment:

II. THE DEIR'S SURFACE TRAFFIC ANALYSIS IS INCOMPLETE.

As noted on page ES-6 of the DEIR, primary local access to the Project Site is provided by a network of streets including Pershing Drive, Lincoln Boulevard, La Tijera Boulevard, Sepulveda Boulevard, Aviation Boulevard, La Cienega Boulevard, La Brea Avenue/Hawthorne Boulevard, Venice Boulevard, Washington Boulevard/Washington Place, Culver Boulevard, Jefferson Boulevard, Manchester Avenue, Westchester Parkway, Century Boulevard, Imperial Highway, El Segundo Boulevard, and Rosecrans Avenue. Six of these primary local access arterials (La Tijera Boulevard, La Cienega Boulevard, Sepulveda Boulevard, Washington Boulevard/Washington Place, Culver Boulevard, Jefferson Boulevard) either run through Culver City or lead to/from Culver City.

The DEIR reveals that the Project, at buildout, will produce (a maximum of) 23,635 car trips per day. DEIR § 4.14.3.4.2, Table 4.14-18. Surprisingly, the impact of this increase in traffic on Culver City is not meaningfully addressed in the DEIR, even though 11% of those trips, or approximately 2,364 per day will use Sepulveda Boulevard as a conduit, Figure 4.14-2, p. 4.14-49, leading directly into, through, and out of, Culver City. An additional 11% of those trips, or approximately 2,364 per day, will use La Tijera Boulevard (which feeds into/from La Cienega Boulevard, a major north-south arterial that passes through the east side of Culver City) as a conduit leading into, and out of, Culver City.

Response:

The Project's traffic analysis (Draft EIR Chapter 4.14) and traffic study (Appendix E) analyzed 10 study intersections within Culver City, including eight intersections along Sepulveda Boulevard, three on Jefferson Boulevard, and two on Culver Boulevard (including intersections of those three Boulevards). La Tijera Boulevard does not run through Culver City, but leads to La Cienega Boulevard. La Cienega Boulevard runs along a short section of the eastern border of Culver City (a section which does not include any signalized intersections and essentially serves as a 6-lanelimited access highway) and passes through approximately one quarter mile of the northeast corner of Culver City (which is over 5 miles from the Project Site). Washington Boulevard and Washington Place run perpendicular to the primary direction of Project traffic, and only

carry small numbers of peak hour trips.

The comment heavily overstates the amount of Project traffic projected to travel into and through Culver City. As shown in Figure 4.14-2 on page 4.14-49 of the Draft Environmental Impact Report, a total of 11% of Project traffic is projected to use Sepulveda Boulevard *at the edge of the Project Site*, which is nearly 1.5 miles south of the closest border of Culver City. As shown in Figure 7 on pages 81 through 91 of the traffic study, where Sepulveda Boulevard enters Culver City at Centinela Avenue, more than half of those trips have already dispersed. At that intersection (#23), the Project is expected to result in 70 southbound and 19 northbound trips during the morning peak hour and 33 southbound and 79 northbound trips during the afternoon peak hour. When compared to the Project's trip generation estimates in Table 4.14-8 on pages 4.14-47 and 4.14-48 of the Draft Environmental Impact Report, this represents less than 4.5% of Project traffic. Based on a total trip generation estimate of 23,635 daily trips, this is a total of 1,029 daily trips entering Culver City – less than half of the 2,364 daily trips cited in the comment. Trips are expected to disperse from Sepulveda Boulevard as they travel further from the Project Site, primarily to I-405, which provides a full interchange at Howard Hughes Parkway, south of Culver City.

Further, the comment states that all of this traffic would travel "into, through, and out of Culver City." This is incorrect. Based on the 2010 Census, as stated on Culver City's website, the city had a population of nearly 39,000 residents. Those residents are ideally located to easily access the Project site for employment or recreation. Further, Culver City has a thriving business community which would surely interact with the businesses expected at the Project Site. Of the 4.5% of Project traffic expected to enter Culver City via Sepulveda Boulevard, over 3% is expected to have a destination within the City. Therefore, less than 1.5% of the Project's total traffic is expected to pass "into, through, and out of" Culver City – or approximately 350 daily trips – on Sepulveda Boulevard.

Similarly, the statement that 11% of Project traffic travels on La Tijera Boulevard, which leads to La Cienega Boulevard and then through Culver City, is misleading. La Tijera Boulevard provides direct access to I-405 in the northbound and southbound directions before it reaches La Cienega Boulevard. Based on the Project traffic shown in Figure 7 of the traffic study at intersection #44 (La Cienega Boulevard & La Tijera Boulevard), approximately 5.4% of Project traffic is expected to travel north on La Cienega Boulevard at that location. Much of it disperses on Slauson Avenue to the east, and at Intersection #88 (La Cienega Boulevard & Stocker Street), only 2.4% of Project traffic remains. This is still 2.3 miles south of the point at which La Cienega Boulevard travels for one quarter mile through the northeast corner of Culver City.

Thus, the comment overstates the amount of Project traffic using Culver City streets and the level of analysis included in the Project's traffic analysis is appropriate for the level of traffic anticipated.

LAXN-AL07-7
Comment:

<u>A. The DEIR Ignores Culver City Intersections Likely to be Impacted by the Increase in Traffic caused by the Project.</u>
The DEIR lacks any analysis of, or mitigation for, the following 13 intersections in Culver City that appear focal in the access to the Project site:

(1) Washington Boulevard/La Cienega Boulevard
(2) Washington Boulevard/Glencoe Avenue south approach (Costco driveway)
(3) Washington Boulevard/Walgrove Avenue
(4) Washington Boulevard/Centinela Avenue
(5) 1-405 Southbound/Sawtelle-Matteson

(6) 1-405 Northbound/Sepulveda Boulevard
(7) Sepulveda Boulevard/Braddock Drive
(8) Slauson Avenue/SR90 ramps
(9) Overland Avenue/Sawtelle Boulevard
(10) Overland Avenue/Jefferson Boulevard
(11) Overland Avenue/Culver Boulevard
(12) Overland Avenue/Washington Boulevard
(13) Inglewood Boulevard and Washington Boulevard

Moreover, the DEIR understates the significance of the Project's impacts on Culver City intersections it does review by applying Culver City's 2% criterion of significance of increase in intersection impact, instead of the 1% criterion used by the City of Los Angeles. However, where the intersections are shared by the two jurisdictions; and where, as here, the Project is entirely within, and created by the City of Los Angeles, it is Culver City's position that Los Angeles' 1% criterion for intersection impact should be employed in analyzing impacts on the intersections in Culver City. In fact, in a letter dated October 31, 2006, in relation to the LAX Specific Plan Amendment Study, Culver City directed the City of Los Angeles to use LADOT guidelines when evaluating potentially impacted intersections within Culver City. (See attached Exhibit A.)

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. The comment lists 13 intersections within Culver City that it suggests should have been analyzed in the Draft EIR because they are used by Project traffic. However, as stated on page 4.14-4 of the Draft EIR:

> *"A traffic analysis study area ("Study Area") was defined in consultation with the City of Los Angeles Department of Transportation (LADOT) by reviewing the travel patterns and the potential impacts of the traffic generated by the proposed Project. The Study Area was defined to ensure that all intersections potentially impacted by the proposed Project were analyzed. This Study Area includes approximately 40 square miles and is generally bound by Venice Boulevard, Washington Boulevard, Jefferson Boulevard, and Baldwin Hills to the north; La Cienega Boulevard, La Brea Avenue, and Hawthorne to the east; Rosecrans Avenue to the south; and the Pacific Ocean to the west. After initial definition, the boundary of the Study Area was extended to confirm that there were no significant impacts at or outside the boundary of the Study Area from the proposed Project."*

The intersections listed in the comment were reviewed during preparation of the Draft EIR, but were determined to have too little Project traffic passing through them to generate a significant traffic impact, and therefore were not included in the Draft EIR. This approach is consistent with CEQA Guidelines Section 15204(a), which notes that "…the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project." Some of these intersections (e.g. La Cienega Boulevard & Washington Boulevard) are also located more than five miles away from the Project site. It should also be noted that the comment letter received on May 4, 2012, from Culver City in response to the Project's Notice of Preparation did not mention the scope of intersection analysis within Culver City, nor request that any specific intersections be studied.

However, in response to the comment's request, supplemental analysis was conducted of 13 additional intersections within Culver City. Like the Project analysis presented in the Draft Environmental Impact Report, this supplemental analysis used year 2010 traffic count data from the LAX Specific Plan Amendment Study (SPAS), which was available for 10 of the 13 intersections, as a basis for analysis. Traffic counts for the remaining three intersections - La Cienega Boulevard & Washington Boulevard, Glencoe Avenue

(South) & Washington Boulevard, and Inglewood Boulevard & Washington Boulevard - were provided by Culver City staff and were also collected in year 2010.

The 13 intersections were factored up by 1.7% to represent year 2012 conditions, consistent with the adjustment applied to the traffic volumes in the Draft Environmental Impact Report (see Draft EIR page 4.14-16). LAWA also prepared a cumulative analysis for these additional intersections for the year 2022 based upon the cumulative methodology described in the Draft EIR, including page 4.14-33. The intersection capacity utilization (ICU) analysis methodology was used to calculate each intersection's volume-to-capacity (V/C) ratio and level of service (LOS). Additionally, two of the 13 intersections are unsignalized, including Overland Avenue & Sawtelle Boulevard and Walgrove Avenue & Washington Boulevard. These intersections were also analyzed using the ICU methodology but with a reduced lane capacity of 1,200 vehicles per hour. At the request of the commenter, LAWA provided analysis based upon Culver City Staff's requested traffic criteria (however, as described in greater detail below, Culver City has offered inconsistent statements about its traffic impact criteria and incorrectly described the status of its traffic thresholds and guidance).

The Project trip distribution pattern developed for the 108 study intersections in the traffic study also extended throughout Culver City, including all of the 13 intersections requested in this analysis. As described in Response to Comment LAXN-AL07-6, over 3% of Project trips were expected to originate or end within Culver City. The 2.4% of Project traffic shown on La Cienega Boulevard at the northernmost study intersection (Stocker Street) was conservatively assumed to continue without dispersal through the intersection of La Cienega Boulevard & Washington Boulevard.

The results of this analysis are shown in Tables LAXN-AL07-1 for Existing with Project conditions (year 2012) and LAXN-AL07-2 for Future with Project conditions (year 2022). As shown in those two tables, Project traffic is not expected to result in a significant impact to any of these 13 intersections, even using the criteria requested in the comment letter. Please see Appendix B of this Final EIR for additional traffic analysis tables.

Culver City Traffic Thresholds

The comment also states that the significance of Project impacts on the 10 intersections within Culver City analyzed in the Draft EIR was understated because it applied Culver City's intersection impact criteria rather than the City of Los Angeles' impact criteria. The comment refers to a letter submitted by Culver City in 2006. The comment alleges that this 2006 letter stated Los Angeles traffic thresholds should be utilized for Culver City intersections. In fact, as described in greater detail below, this is not an accurate description of the contents of the 2006 letter. Furthermore, no such request was made in the Culver City letter submitted on May 4, 2012 in response to the Project's Notice of Preparation (the purpose of the NOP comments is to discuss the scope and content of the EIR; CEQA Guidelines 15082(b)). LAWA has also previously prepared a response to comment on the issue of Culver City's Traffic Thresholds in the SPAS FEIR (Response SPAS-AL00007-33):[4]

> "The comment states that the thresholds of significance used in the SPAS Draft EIR traffic impact analysis for Culver City differ from those that the City of Culver City requested LAWA use, referring to a letter dated October 31, 2006.
>
> Contrary to the assertions in the comment, the referenced letter from 2006 stated that "the City of Culver City is in the process of updating our guidelines for preparing traffic studies" and requested that "*in the interim*" LADOT's thresholds be used for development projects in the City of Los Angeles. Culver City's revised traffic study guidelines were considered by the Culver City Planning Commission in a public hearing on June 17, 2009, which was continued to June 30, 2009. The

revisions proposed to change Culver City's thresholds of significance to conform to those used by the City of Los Angeles. Culver City's website does not include formal minutes for those two meetings, but it does include videos of them. In minute 181 of the June 30, 2009 hearing, a vote was taken to retain Culver City's existing thresholds of significance, rather than adopt the standards used by the City of Los Angeles.[1]

…The letter referred to in the comment was written prior to the June 30, 2009 decision by the Culver City Planning Commission.[3] The use of these thresholds [utilized in the SPAS EIR] was confirmed with Culver City's Traffic Engineer, Mr. Barry Kurtz in March 2011 (the same contact person referenced in Culver City's October 31, 2006 letter), as stated in Footnote 700 at the bottom of page 4-1226 [of the SPAS EIR]. Similarly, LAWA confirmed the same traffic thresholds of significance with Culver City's Traffic Engineering Manager, Mr. Max Paetzold, on April 17, 2009, for LAWA's Bradley West Project Draft EIR. (Bradley West Project Draft EIR, page 4-118, fn 62.)[2] [These thresholds were also confirmed by Culver City Staff for the Los Angeles Community College District Facilities Master Plan, as described in Footnote 6.] LAWA, as the lead agency, has the discretion to select and apply thresholds of significance for its projects. (CEQA Guidelines Section 15064(b); *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477.) The thresholds of significance used in the SPAS Draft EIR for intersections in Culver City were appropriate, in light of the above facts.

[1] City of Culver City, City Council Meeting Webcast, June 30, 2009, Available: http://www.culvercity.org/Government/Misc/Webcast.aspx?id=063009, accessed November 8, 2012. [Since publication of the SPAS FEIR, Culver City has posted minutes for this meeting which state: "Moved by Commissioner Pleskow and seconded by Commissioner Smith Frost to retain the current threshold. The Motion carried by the following voice vote." – Planning Commission Minutes dated June 30, 2009 available online at:
http://www.culvercity.org/pdfs_minutes/12102009101851AMMINUTES-JUNE30,2009.pdf]

[2] Bradley West Draft EIR, page 4-118 is available online at http://ourlax.org/pdf/LAX%20Bradley%20West%20Project%20DEIR%20Volume%201.pdf

[3] Culver City's original traffic thresholds and traffic guidance were approved by the Culver City Council on September 14, 1987. Culver City provides no evidence that City Staff were given the authority to unilaterally repeal its official guidance and thresholds without subsequent City Council action.

Culver City's outside counsel claimed in subsequent correspondence on the SPAS FEIR, that the Culver City Planning Commission made a determination that necessitates LAWA use the City of Los Angeles' thresholds in Culver City. However, the Culver City Planning Commission made no such determination at that June 30, 2009 hearing (nor any other hearing of which LAWA is aware). The Culver City Planning Commission approved a motion to *"recommend that the City Council"* adopt amendments to its traffic guidance, while keeping its existing traffic thresholds.[1] LAWA has been unable to locate any subsequent action by the Culver City Council on its traffic guidance or its traffic thresholds, nor is any such guidance provided on the City's traffic engineering website.[5] The fact that Culver City is citing an eight year old comment letter further indicates that the Culver City Council has not acted upon this recommendation. Other Public Agencies have also prepared similar responses to comments received from Culver City.[6] Furthermore, as discussed above, LAWA as lead agency for this project has discretion to select significance criteria for its project.

However, for the purpose of additional disclosure, the Project's traffic study (*Transportation Study for the LAX Northside Plan* Update, Gibson Transportation Consulting, Inc., May 2014, presented as Appendix E to the Draft Environmental Impact Report) did analyze the 10 Culver City study intersections using the requested impact criteria. That analysis, presented in Appendix C to the traffic study, concluded that at Intersection #86, Sepulveda Boulevard & Jefferson Boulevard & Playa Street, Project traffic would exceed the requested impact criteria. Inclusion of this material is noted in Draft Section 4.14.3.2.2: "Additionally, at the request of Culver City staff, an analysis of Culver City intersections was conducted using the more rigorous significant impact criteria of the City of Los Angeles, which is provided for informational purposes only and is not required by CEQA. This analysis is contained in Appendix C (Culver City Supplemental Analysis) to Appendix E (Traffic Study). This requested analysis is (1) provided for informational purposes only, (2) is not required by CEQA, (3) is inconsistent with LAWA's traffic methodology as described in Section 4.14.3.2.2, and (4) is not used as a threshold of significance for this EIR." (See also FEIR, Chapter 3, Corrections and Additions.) These materials and supplemental traffic analysis were also discussed with Culver City staff at in-person meetings at Culver City Hall on June 6, 2014 and July 22, 2014 (prior to submittal of this letter).

In consultation with Culver City staff, a condition of approval for that intersection was also offered and is described in detail in Response to Comment LAXN-AL07-8 below.

[4] SPAS FEIR is available online at:
http://www.lawa.org/uploadedfiles/spas/pdf/LAXSPAS-FEIR%20Main%20Document%20Final%202013-01-25.pdf

[5] Culver City Traffic Engineering Website available online at:
http://www.culvercity.org/Government/PublicWorks/TrafficEngineering.aspx [accessed November 20, 2014]. At the time this website was reviewed by LAWA, the only guidance provided on the webpage was for the City's 2004 NTMP Program Procedures Manual (a neighborhood initiated traffic management program), and information related to Culver City's preferential parking program. No information is on the City's traffic analysis criteria/thresholds or guidance.

[6] The Los Angeles Community College District certified, in August 2010, the Final Supplemental EIR for the West Los Angeles College 2009 Facilities Master Plan, which included Responses to Culver City's Comment Letter (Responses B-85 and A-23) which noted: "The 2005 FEIR used the thresholds of significance for the jurisdictions within which each intersection was located. This is a common method for projects that result in cross jurisdictional impacts. See Responses A-21 and A-23 above…As stated in the response to comment A-23 above, in June 2009 the City of Culver City concluded a public process that occurred subsequent to the letter referred to in this comment. As a result of that process, no changes were made to the City's significance criteria for determining traffic impacts…[A-23] At the May 1, 2009 meeting between WLAC College staff and their consultants and the City of Culver City staff, City staff advised the College that the use of City of Los Angeles significance criteria for traffic were to be considered by the Culver City Planning Commission in late May and that details of the requested criteria would be available after that meeting. At two hearings in June, 2009 the Culver City Planning Commission considered modifications to the citywide traffic study criteria but decided to maintain the current thresholds of significance and rejected the use of the City of Los Angeles criteria for projects in Culver City. *The City has indicated that the 2005 FEIR analysis that used the Culver City thresholds is still valid*. Any new traffic studies that may be required for the campus shall use the then-current Culver City traffic study requirements for out of City developments (Page 3.17-7, last sentence in the last full paragraph references July 2009; the reference should be to June 2009.)" (Emphasis

added) Available online at:
http://www.wlac.edu/masterplan/documents/FinalEIR.pdf

LAXN-AL07-8
Comment:

B. The DEIR Cumulative Traffic Analysis is Inadequate.
The DEIR's list of related projects is similarly deficient. That list omits mention of a number of projects in Culver City, as well as some in the City and County of Los Angeles.

These include:

(1) The Playa Vista Buildout
(2) Sony Pictures Studios Comprehensive Plan (the Jimmy Stewart Building and all other improvements contemplated in the Comprehensive Plan)
(3) Washington/Landmark at 8810 Washington Boulevard
(4) Legado Mixed Use TOD at 8770 Washington Boulevard
(5) Office and Retail Building at 700 Corporate Pointe
(6) Parcel B at 9300 Culver Boulevard
(7) Triangle Site-Washington/National TOD
(8) West Los Angeles College Master Plan
(9) Culver Studios Amendment No. 6 at 9336 Washington Boulevard
(10) The Planned Future Development of the Marina del Rey and Via Marina Areas

In addition, the DEIR entirely fails to address the cumulative traffic impacts of the Specific Plan Amendment Study ("SPAS") project. While the EIR for the SPAS project claims that it is purely for safety and efficiency purposes; will not increase capacity; and, thus, will not significantly increase off-airport surface traffic, the broad scope of the SPAS project and its facilitation of access for a greater number of larger aircraft, carrying a greater number of passengers, will inevitably lead to more surface traffic travel to and from the airport. It certainly would be expected that the historic and current traffic patterns will continue, which will result in a significant portion of that traffic accessing the airport through Culver City. Nevertheless, the DEIR utterly fails to account for the cumulative impacts of the Northside and SPAS projects on Culver City, and consequently requires amendment to account for the impacts of these additional projects.

Finally, the DEIR misses the opportunity to mitigate at least some of these unreported direct and cumulative impacts, as well as those already discussed. For example, the DEIR fails to mention any mitigation for the Project's impacts at the intersection of Jefferson Boulevard and Sepulveda Boulevard. Culver City requests that the DEIR be amended to include a discussion of the potential for mitigation of the Project's manifest traffic impacts on Culver City, including, but not limited to, installation of triple left turn lanes for eastbound Jefferson traffic to northbound Sepulveda. For eastbound traffic there would be two left lanes only, one left/through optional lane, and one through/right optional lane. This operational change shall require opposed phasing for eastbound and westbound traffic, changes in signal hardware, restriping and pavement marking upstream, as well as enhanced signage.

In short, the DEIR significantly understates both the Project's direct and cumulative surface traffic impacts on Culver City, and lacks any mention of mitigation to compensate for those impacts. Until those deficiencies are rectified, the DEER will remain inadequate.

Response:

The comment first asserts that the cumulative analysis is deficient because it does not specifically mention 10 specific development projects. However, the commenter does not accurately portray the methodology utilized by LAWA, as well as the various approaches to cumulative analyses provided by CEQA. CEQA Guidelines Section 15130(b)(1) provides two potential approaches to a cumulative impact analysis under CEQA. The first

approach is often referred to as the list of projects approach, and the second approach is often referred to as the projections approach (which can be supplemented with additional information such as a regional modeling program). (See CEQA Guidelines Section 15130(b)(1)(A) and (B).) The cumulative analysis for this EIR used the latter approach which is permissible under CEQA (See *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899.). As discussed in Section 4.14.3.1.2:

> Future 2022 traffic conditions are assessed based on future traffic forecasts developed using the LAX Model. The LAX Model is based on the City of Los Angeles Transportation Strategic Plan travel demand forecasting model (the "TSP Model"), which is in turn based on the SCAG regional travel demand model (the "SCAG Model").[1] The TSP Model provides additional detail in terms of the land use database and the street network in the City of Los Angeles area that are not found in the SCAG Model. The LAX Model adds further detail in the area surrounding the Airport to the TSP Model.
>
> All of these models use a database of existing and forecast future regional developments to generate and distribute trips based on locally researched trip generation rates and travel patterns. The LAX Model land use database captures all projected regional development between 2010 and 2025, including all projected land use growth and change in the Study Area. The LAX Model produced 2025 peak hour traffic volumes on street segments throughout the Study Area. These volumes were converted into intersection turning movement volumes using the Fratar process. These volumes were reduced to reflect 2022 conditions based on the relative difference between the 2025 LAX Model output and the 2012 existing conditions…[¶]…The LAX model captures all projected regional development in the Study Area between 2010 and 2025, including, but not limited to, the related projects discussed below...[¶]…Related Projects…A comprehensive list of 104 related projects was compiled based on information provided by LADOT; the cities of Inglewood, El Segundo, Culver City, Manhattan Beach, and Hawthorne; the County of Los Angeles, and recent published reports for other projects. The List of Related Projects is provided in Table 9 in the Transportation Study for the LAX Northside Plan Update in Appendix E of this EIR.
>
> [1] The SCAG Adopted 2012 Regional Transportation Plan (RTP) Growth Forecast can be found at:
> http://gisdata.scag.ca.gov/Lists/Socio%20Economic%20Library/Attachments/43/2012AdoptedGrowthForecast.xls. Trip assignment output data for the LAX Model can be provided upon written request. Because of the sheer volume and lack of added value these technical working files provide, they were not included within the Draft EIR.

LAWA has revised the related projects list in Table 9 of the traffic study (Appendix E, as well as all the relevant resource chapters) to include the ten additional projects requested by the commenter as related projects for purposes of the cumulative analysis. The addition of these projects does not change any conclusions in the Draft EIR. Please see Chapter 3.0 of the Final EIR for Corrections and Additions to the Draft EIR.

The development of the Future without Project (year 2022) traffic conditions for use in the Project's Draft Environmental Impact Report was conducted using a traffic forecasting model originally prepared for the SPAS traffic analysis. The LAX Traffic Model was developed using a modified version of the City of Los Angeles travel demand forecasting model, which was itself developed from the Southern California Association of Governments (SCAG) regional travel forecasting model, calibrated and validated for the City of Los Angeles. The LAX Traffic Model was also enhanced with adjustments to land use density, land use diversity, accessibility of various areas, and the distance to transit

for each model zone. The LAX Traffic Model, along with its parent and grandparent models, are programmed with details of existing and anticipated development throughout their coverage areas based on information provided by the local jurisdictions. In most cases, the anticipated future development is based on zoning and planning for each model zone, rather than specifics of actual proposed projects. In this way, the LAX Traffic Model can provide reasonable traffic forecasts decades into the future, even though much of the development that will likely occur within that timeframe has not yet been conceptualized, let alone proposed or approved. Additional details regarding the calibration and validation of this model are included in SPAS Draft EIR Section 4.12.2.2.2.[2]

Therefore, for the purposes of the Project's traffic analysis, the list of related projects is simply a list of proposed developments within the Study Area. The actual Future without Project (year 2022) traffic forecasts include not only the known developments provided in the related projects list, but also other known and proposed projects that may or may not have been included in the detailed localized list. More importantly, as-yet-unknown future development that is expected based on each local jurisdiction's General Plans and land use zoning are included in the model's land use projections even though there is not a specific reference to a project in the related projects list. In this manner, the related projects listed in the comment were accounted for in the development of the Future without Project (year 2022) traffic conditions. The addition of these related projects to the FEIR list will not, however, change the results of the traffic impact analysis because, as stated above, these projects (or a similar magnitude development nearby) were included in the long-range SCAG model developed to establish the Regional Mobility Plan. LAWA and LADOT have reviewed the LAX Model and are comfortable that it is consistent with the SCAG Model.

The comment further mischaracterizes the analysis, methodology, and conclusions in the SPAS EIR when the commenter states:

> While the EIR for the SPAS project claims that it is purely for safety and efficiency purposes; will not increase capacity; and, thus, will not significantly increase off-airport surface traffic, the broad scope of the SPAS project and its facilitation of access for a greater number of larger aircraft, carrying a greater number of passengers, will inevitably lead to more surface traffic travel to and from the airport.

Though the comment refers to a wholly separate proposed development from the proposed Project, the SPAS analysis is and was an important consideration in the development of the Project's traffic study, and therefore this response examines the traffic analysis in the SPAS Draft EIR (Section 4.12.2 of *LAX SPECIFIC PLAN AMENDMENT STUDY DRAFT EIR*, Los Angeles International Airport, July 2012). More specifically, LAWA responded to this comment in SPAS Draft EIR Response-SPAS-AL00007-8 which states in part:[3]

> As required by the Stipulated Settlement, the formulation and evaluation of alternatives to the LAX Master Plan Yellow Light Projects are consistent with a practical capacity of 78.9 MAP [Million Annual Passengers]. As described in Appendix F-1 of the Preliminary LAX SPAS Report, passenger activity levels at LAX are not expected to reach 78.9 MAP until 2024. The 78.9 MAP forecast reflects the fact that all of the SPAS alternatives include (i) no more than 153 gates and (ii) amendment of the LAX Specific Plan Section 7.H, requiring action to encourage further shifts in passenger and airline activity to other regional airports if the annual aviation activity analysis forecasts that the annual passengers for that year at LAX are anticipated to exceed 75 MAP, and, requiring a Specific Plan Amendment Study if the annual aviation activity analysis forecasts that LAX annual passengers for that year are anticipated to exceed 78.9 MAP. Both this physical gate limit and the

> proposed amendment to the LAX Specific Plan reflect the fact that the practical capacity of LAX is based on market assumptions, as well as the expected physical characteristics of the various functional elements of the airport and how they are planned and expected to work together, given how the market is likely to respond and use LAX. (See Preliminary LAX SPAS Report, Section 6.2.) Based on the Design Day Flight Schedule (DDFS), including aircraft fleet mix and aircraft gating, associated with that projection, detailed airfield simulation modeling (i.e., SIMMOD) was conducted for SPAS Alternatives 1 through 4, which is presented in Appendix F-2 of the Preliminary LAX SPAS Report. As indicated in Appendix F-2, the modeling demonstrated that there was not a substantial difference between the alternatives relative to average delay times and unimpeded taxi times. Additionally, relative to the commenter's indication that airfield capacity is represented by "throughput rate i.e., the maximum number of operations that can take place in an hour," the modeling demonstrated that the number of peak hour throughput operations is not materially different between SPAS Alternatives 1 through 4. The similarities between alternatives relative to peak hour throughput is evident in comparing Tables 10, 12,14, and 16 in Appendix F-2 for Alternatives 1, 2, 3, and 4, respectively.

The passenger activity analyzed in the SPAS EIR (78.9 MAP) was also consistent with the LAX growth projection in the 2012 RTP adopted by SCAG.[4] Nevertheless, the SPAS EIR conservatively assumed that changes in the passenger growth at LAX were impacts of SPAS. As described on SPAS Draft EIR page 4-1208 and 1209:

> Over the course of the 15 years between Baseline (2010) Without Alternative conditions and 2025 completion of the SPAS improvements, the volume of passengers traveling through LAX is expected to increase due to growth in the Los Angeles region, irrespective of whether the proposed improvements are implemented. Nevertheless, this growth was not included in the "Future (2025) Without Alternative Scenario," but was included in the "Future (2025) With Alternative Scenarios." This approach is considered to be very conservative in delineating the future off-airport traffic impacts of the SPAS alternatives because the vehicle trips associated with projected growth in aviation activity at LAX would occur regardless of whether the project is implemented….[¶]…The Future (2025) Without Alternative scenario includes cumulative growth projections related to vehicle trips in the area surrounding LAX and traffic generated by reasonably foreseeable planned development, but holds airport-related trip generation levels at Baseline (2010) Without Alternative MAP level [56.5 MAP]….[¶]…By using this scenario as the basis of comparison for evaluating Future (2025) With Alternative conditions, the alternatives' contribution to cumulative impacts includes ambient growth at the airport, even though the growth would occur regardless of adoption of a SPAS alternative.

The comment states that the Northside Project traffic analysis did not properly account for the increase in traffic due to the SPAS project. However, as stated above, the LAX SPAS Traffic Model was used to project the Future without Project (year 2022) conditions that were used as the future conditions for Northside Project's traffic analysis. Therefore, the Project analysis at Culver City intersections already included both SPAS traffic and Project traffic. No additional analysis is required.

The impact to the intersection of Sepulveda Boulevard & Jefferson Boulevard & Playa Street (Intersection 86) was less than significant, as provided in Draft EIR Table 4.14-9 and 4.14-11. In subsequent conversations with Culver City Staff prior to closure of the Draft Environmental Impact Report comment period, the physical improvement described in the comment was requested by Culver City staff and agreed to by LAWA as a condition of approval. As described in the comment, the improvement would consist of the

installation of triple left-turn lanes for the eastbound Jefferson Boulevard approach to northbound Sepulveda Boulevard, and associated signage and traffic signal improvements. The condition of approval would provide two left-turn lanes, one shared left-turn/through lane, and one shared through/right-turn lane in the eastbound direction. East/west split signal phasing and necessary traffic signal indications would be installed, pavement would be restriped, and signage would be enhanced to reflect the change. The condition of approval would have the effect of increasing capacity to the left-turn while decreasing through capacity, lessening the amount of eastbound traffic on Playa Street. The condition of approval is included as PDF T-20 and reads:

- **PDF T-20:** Upon completion of 55% of Project development, or 1,400 afternoon peak hour trips, the Project would complete or have completed the following improvement to Intersection #86, Sepulveda Boulevard & Jefferson Boulevard & Playa Street: Add a third eastbound left-turn lane, along with associated signage and traffic signal improvements. After implementation of the improvement, this intersection would provide two left-turn lanes, one shared left-turn/through lane, and one shared through/right-turn lane in the eastbound direction.

Please see Chapter 3.0 Corrections and Additions to the Draft EIR.

An analysis was conducted to measure whether the proposed condition of approval would improve the intersection. Culver City staff provided alternative traffic counts which showed that the majority of eastbound approaching traffic at the intersection of Sepulveda Boulevard & Jefferson Boulevard & Playa Street turned left, at approximately a 2 to 1 ratio compared to the volume of cars continuing east onto Playa Street. In consultation with Culver City staff, this ratio of left-turns to through movements was applied to the year 2012 and year 2022 traffic volumes from the Project's traffic study, which prior to the change had shown approximately a 1 to 1 ratio of left-turns to through volumes during the afternoon peak hour. This change does not affect the conclusion in the Draft EIR that the impact to this intersection is less than significant. The level of service analysis showing the efficacy of this improvement is summarized in Table LAXN-AL07-3 for both Existing with Project with Conditions of Approval (year 2012) and Future with Project with Conditions of Approval (year 2022). Please see Appendix B of this Final EIR for additional traffic analysis tables. As shown in the Table, with implementation of the proposed condition of approval, the Project's traffic conditions are improved and remain less than significant.

[2] SPAS Draft EIR, Section 4.12.2.2.2 is available online at:
http://www.lawa.org/uploadedfiles/spas/pdf/SPAS%20DRAFT%20EIR/LAX%20SPAS%20DEIR%20Main%20Document%20Final.pdf

[3] SPAS FEIR is available online at:
http://www.lawa.org/uploadedfiles/spas/pdf/LAXSPAS-FEIR%20Main%20Document%20Final%202013-01-25.pdf

[4] The Southern California Association of Governments 2012 RTP is available online at: http://rtpscs.scag.ca.gov/Pages/default.aspx. The direct weblink is provided here: http://rtpscs.scag.ca.gov/Documents/2012/final/f2012RTPSCS.pdf

LAXN-AL07-9
Comment:

III. THE DEIR ANALYSIS OF THE PROJECT'S IMPACTS ON TRANSIT IS SIMILARLY INCOMPLETE.

A. The DEIR Ignores Culver City Transit.

The DEIR's transit analysis, like its surface traffic analysis, pays little or no attention to the Project's impacts on Culver City. For example, Table 4.14-1 states that no information

was available concerning the Culver CityBus ("CCB"), even though the DEIR also states that CCB is one of the lines that takes travelers directly to "The Aviation/LAX Green Line Station" and "LAX City Bus Center," § 4.14, p. 4.14-10. Clearly, CCB transit information should, on that basis alone, be included in the DEIR. Further, CCB's transit service runs on Sepulveda Boulevard, Aviation Boulevard, La Cienega Boulevard, Washington Boulevard, Culver Boulevard, Jefferson Boulevard, and Century Boulevard, all of which are identified as part of the primary local access to the Project site. As a result, the DEIR should be enhanced with respect to impacts on CCB lines, both on the demand on service capacity due to trips generated by the Project and potential travel time increases due to surface traffic generated by the Project.

Response:

The Project's Draft EIR Sections 4.14.2.2.1 and 4.14.3.4.5 and the traffic study (Appendix E) compiled a list of transit routes within the Study Area, including Culver City Bus Routes 1 through 7 and Culver City Bus Rapid Route 6. Each of those routes are listed, along with their hours of operation and peak period headways, in Appendix E Table 6 provided on pages 46 and 47 of the traffic study. Appendix E Table 7, on page 48, provides additional detail about those transit lines that could reasonably be expected to serve the Project for the purposes of conducting a transit capacity analysis. The only Culver City Bus routes that get near the Project Site are Route 6 and Rapid Route 6, both of which travel on Sepulveda Boulevard immediately east of the Project Site. Other Culver City Bus routes do travel on streets that Project traffic would be expected to use, but do not provide service near to the Project Site. It would be inappropriate to include such routes as part of the transit system capacity serving the Project Site, and thus they were excluded from Table 7 and the transit capacity analysis.

The comment further states that no data for the Culver City Bus routes (Route 6 and Rapid Route 6) was included in Draft EIR Table 4.14-1. However, the reason no data was shown for those routes in the analysis is because Culver City staff could not provide data that detailed peak hour ridership numbers, as noted on Draft EIR page 4.14-10 (footnote 1). The only data offered from the City when queried was daily total boardings along the entire route, which tells nothing of how full the bus route is during the peak periods, let alone how full the bus is in the vicinity of the Project Site. As a result, the transit capacity analysis was conducted with the highly conservative assumption that the Culver City Bus had *no* residual capacity.

Furthermore, in a meeting with Culver City staff on July 22, 2014, it was indicated by Culver City staff that the prevailing direction of heavy transit demand for Culver City Bus Route 6 and Rapid Route 6 is in the northbound direction during the morning peak hour and in the southbound direction during the afternoon peak hour. Based on current published schedules for those buses, they run with similar frequency in the northbound and southbound directions during each peak hour. That implies that there is, at the least, residual capacity in the opposite directions of the peak demand, that is to say there is residual capacity in the southbound direction during the morning peak hour and in the northbound direction during the afternoon peak hour. The Project, as a primarily commercial development with no residential component, is heavily skewed toward generating inbound trips during the morning peak hour (that is, southbound for traffic or persons traveling on Sepulveda Boulevard) and toward generating outbound trips during the afternoon peak hour (that is, northbound for traffic or persons traveling on Sepulveda Boulevard). Therefore, the Project would primarily add trips to the Culver City Bus Route 6 or Rapid Route 6 in the direction that has residual capacity, and in that way could help to better balance the directional usage of the Culver City Bus along that route. At the least, the Project would not be burdening the Culver City Bus system and would not result in a significant impact. Refer to Response to Comment LAXN-AL07-10 for a detailed analysis of the number of transit trips that could potentially be added to Culver City Bus during the peak hours.

The comment states that analysis must be conducted to assess the Project's impact on travel times in the region, specifically to determine how Culver City Bus routes will be affected. The traffic study was conducted using LADOT's guidelines and methodologies, which do not require travel time analysis. Furthermore, the level of service analysis adequately addresses intersection impacts to all vehicular users, including transit. Transit buses are counted just like every other vehicle during collection of traffic count data upon which the level of service analysis is based, and therefore these buses are inherent in the analysis.

LAXN-AL07-10
Comment:

B. DEIR Transit Analysis Overly Generalizes Capacity Impacts.
First, with respect to analysis of the impacts of the Project on transit capacity, the DEIR traffic study generalizes the transit capacity impacts of the Project using the overall transit residual capacity over all transit lines in the study area. However, not all bus lines are impacted equally by the trips generated by the Project. Sepulveda Boulevard (Culver CityBus Local and Rapid 6 service) is a major access to/from the airport (and the Project) and a detailed analysis should be provided on the impacts to the transit capacity along the Line 6 corridors.

Moreover, the results in Table 7, reflecting existing transit service patronage and residual capacity, are calculated on an average value of the load factor across all bus lines to estimate the residual capacity per run. However, the ridership patterns on the bus lines usually depend on commute patterns; therefore, the transit capacity impact analysis should look at the impacts to transit capacity per direction. CCB's Local 6 and Rapid 6 currently experience overcrowding in both northbound and southbound directions during peak hours, and the impacts of the Project will most likely require CCB to add more service to respond to increased demand.

Response:

The Project's transit capacity analysis was conducted to satisfy the requirements of the Los Angeles County Congestion Management Program (CMP), and followed the guidelines therein.

Table LAXN-AL07-4 summarizes a calculation of the number of Project person-trips that are expected to use either Culver City Bus Route 6 or Rapid Route 6 on a daily and peak hour basis. Please see Appendix B of this Final EIR for additional traffic analysis tables. Those two bus routes travel between the Green Line and Culver City via Sepulveda Boulevard. As described in Response to Comment LAXN-AL07-6 above, a total of 4.5% of Project traffic is expected to enter Culver City via Sepulveda Boulevard, and therefore would potentially use Culver City Bus Route 6 or Rapid Route 6 as an alternative to an automobile. As requested by comment LAXN-AL07-11, average vehicle occupancy (AVO) of 1.40 was used to convert vehicle trips into person trips. As described in detail in Response to Comment LAXN-AL07-12, 7.5% of all Project trips were assumed to use public transit as part of the transit capacity analysis contained in the traffic study (The CMP guidelines suggest a factor of 7% of all Project trips for a primarily commercial project within ¼ mile of a CMP transit corridor, such as Lincoln Boulevard or Sepulveda Boulevard. Further, this assumption exceeds the Project's 5% transit credit applied to the trip generation estimates for office, research and development, and community/civic uses, and is therefore a more conservative assumption (i.e., results in higher transit trip estimates) for the purposes of conducting the transit impact analysis). By applying these various factors to the Project's trip generation estimates from Table 4.14-8 on pages 4.14-47 and 4.14-48 of the Draft Environmental Impact Report, the number of person-trips the Project can be expected to add to those two Culver City Bus lines can be estimated. As shown in Table LAXN-AL07-4, the Project would add approximately 9 morning peak hour transit riders (7 southbound, 2 northbound) and 12 afternoon peak hour transit riders (4 southbound, 8 northbound) to those two lines combined. Please see

Appendix B of this Final EIR for additional traffic analysis tables. Based on current information from the Culver City Bus website, both Culver City Bus Route 6 and Rapid Route 6 run every 15 to 20 minutes in each direction during the morning and afternoon peak hours, meaning there are a total of 12 to 16 buses, each with a capacity of at least 40 riders, traveling on Sepulveda Boulevard during both the morning and afternoon peak hours. At most, the Project could add one rider to each of those buses. Additionally, as described in Response to Comment LAXN-AL07-9, Culver City staff indicated that the predominant direction of travel for transit riders on Route 6 and Rapid Route 6 is northbound during the morning peak period and southbound during the afternoon peak period, which is opposite the direction of Project traffic. In the peak direction, the Project would add 2 transit riders during the morning peak hour and 4 transit riders during the afternoon peak hour – well under one rider per bus.

On September 25, 2014, Culver City staff provided a 2010 report on the performance of Culver City Bus Route 6 and Rapid Route 6 (CCB Route 6 Report). The CCB Route 6 Report contained information about revenue, ridership, and travel times for Route 6 and Rapid Route 6. However, the data was not specific enough to estimate the residual capacity of the two bus routes during the morning and afternoon peak hours. The CCB Route 6 Report indicated the following key figures relating to Route 6:

- As indicated by Culver City staff, the CCB Route 6 Report confirmed that Route 6 has heavier ridership in the northbound direction during the morning peak hour and in the southbound direction in the afternoon peak hour (opposite the directions of peak hour Project traffic).
- The maximum load (i.e., peak ridership on a single bus during the peak hour) in the northbound direction at Sepulveda Boulevard & Westchester Parkway was 34 riders; the maximum northbound load anywhere along the route was 66 riders at Sepulveda Boulevard & Richland Avenue, approximately 6.0 miles north of the Project Site. The average maximum load is 31 riders.
- The maximum load in the southbound direction at Sepulveda Boulevard & Westchester Parkway was 47 riders; the maximum southbound load anywhere along the route was 60 riders at Sepulveda Boulevard & Pico Boulevard, approximately 6.3 miles north of the Project Site. The average maximum load is 29 riders.
- The CCB Route 6 Report indicates that many riders travel short distances, using the bus for local circulation.

Similarly, the CCB Route 6 Report indicated key figures relating to Rapid Route 6:

- Rapid Route 6 has heavier ridership in the northbound direction during the morning peak hour and in the southbound direction in the afternoon peak hour.
- The maximum load in the northbound direction at Sepulveda Boulevard & Manchester Avenue was 63 riders; the maximum northbound load anywhere along the route was 66 riders at Sepulveda Boulevard & Palms Boulevard, approximately 5.0 miles north of the Project Site.
- The maximum load in the southbound direction at Sepulveda Boulevard & Manchester Avenue was 30 riders; the maximum southbound load anywhere along the route was 54 riders at Sepulveda Boulevard & Pico Boulevard, approximately 6.3 miles north of the Project Site.

What the CCB Route 6 Report does not say is how the maximum load on each route compares to the loads for neighboring bus trips – that is, how much lower the maximum loads are on the trips before and after the peak trip. As a result, it is impossible to accurately gauge residual transit capacity during the peak hours. However, as calculated above, the Project would add less than one rider per bus trip in the peak direction during the peak hours, which would not cause Culver City Bus to purchase and operate

additional buses on those routes. If the routes are experiencing overcrowding in both directions during peak periods today, well before the Project begins construction, as claimed in the comment and supported by the data provided, then the need to add additional service cannot be attributed to the Project.

The comment also suggests that the method used to calculate the load factors to determine transit system capacity were flawed, suggesting that the true load was understated. In fact, the calculation of the load factors was extremely conservative. Table 7 of the traffic study shows the load factors calculated for each route for which detailed ridership data was available (which did not include Culver City Bus routes). For a given transit line, each run of that route during the peak hour was reviewed to determine the highest load (that is, number of passengers) at any time at any point on that route. That is, even if 12 extra passengers got on a bus for a single stop, 12 miles from the Project site, the load for that one stop was attributed to the entire run for the entire length of the route. That peak load was ascertained for each run of each line throughout the peak period to determine the highest peak load during the morning and afternoon peak periods. Next, that highest peak load was averaged along with the peak loads of the two runs prior to and two runs after the highest peak. Thus, the resulting “average load” consists of the averages of the peak loads across five consecutive runs of a particular route. Of particular importance is the fact that the average load is in fact based on the peak direction, since the peak direction is the one with the highest peak loads. In this analysis, the minority direction of travel is assumed to have as high a ridership as the peak direction. For all of these reasons, the transit capacity analysis was extremely conservative, and likely understates the resulting residual capacity on the transit system in the vicinity of the Project Site.

LAXN-AL07-11
Comment:

C. DEIR Uses Incorrect Methodology in Estimating Impacts.
The CMP Transit Capacity Analysis used 10% to estimate the year 2022 load factor to reflect 10 years of transit ridership growth or a rate of 1% per year. CCB, however, has experienced approximately 4% ridership increase per year since 2010. The percentage increase in the DEIR should reflect the actual anticipated average ridership growth of individual lines.

Page 160 of the traffic study, under "Provision of Additional Buses" section, proposes providing two buses for Metro Route 115 on Manchester Boulevard to bolster transit capacity and LOS in the Study Area. The traffic study used average vehicle occupancy of 1.2 people per vehicle to calculate the capacity of a 40-foot bus to remove 33 vehicles from Manchester Boulevard. Per Metro's 2010 Congestion Management Program guidelines, average vehicle occupancy of 1.4 people per vehicle should be used, and a 40-foot bus only has the capacity to remove 29 vehicles from the road. This correct number (29 vehicles) should be reflected in the traffic study and the Final EIR.

Response:

Transit capacity was measured against the anticipated transit trips generated by the Project to determine if the Project would cause a capacity deficiency. This analysis was described in detail in Chapter 9 of the traffic study beginning on page 242. As concluded in the traffic study, in year 2022 the transit system would maintain a surplus capacity of 2,107 persons during the morning peak hour and 2,175 persons during the afternoon peak hour. The Project would be anticipated to add a total of 211 morning peak hour person-trips and 267 afternoon peak hour person-trips, significantly less than the available capacity.

The comment states that transit ridership on Culver City Bus has experienced 4% annual ridership increases since year 2010. The comment provided no substantiating data for its claim, however, at the request of the comment, a supplemental analysis of transit

capacity was conducted conservatively assuming a total of 40% growth in transit ridership on all bus lines (not just Culver City Bus) between year 2012 and year 2022 (10 years at 4% annually). Even though the comment only noted higher growth rates for Culver City Bus, this analysis conservatively assumed that all bus carriers experienced similar growth rates. Table LAXN-AL07-5 summarizes the revised residual capacity calculations for the transit lines for which data was available. As it shows, the transit system would maintain a total of 1,219 peak hour person-trips during the morning peak hour and 1,276 peak hour person-trips during the afternoon peak hour. As in the analysis presented in the Draft EIR, this supplemental analysis conservatively assumed no capacity for any bus line for which no data was available or for any future transit lines, such as the Metro Crenshaw/LAX Transit Corridor, the Airport Metro Connector, and the South Bay Metro Green Line Extension. The Project transit trips (211 during the morning peak hour and 267 during the afternoon peak hour) would not exceed the estimated available capacity even using the conservative assumptions requested in the comment, as shown in Table LAXN-AL07-6. Please see Appendix B of this Final EIR for additional traffic analysis tables.

The comment also requests that an AVO of 1.4 be used to determine how many vehicles could be removed from the street due to the addition of buses to Metro Route 115, rather than the AVO of 1.2 used in the traffic study. The AVO of 1.2 was agreed to by Los Angeles Department of Transportation, who has ultimate say as the lead agency. Further, Metro Route 115 does not pass through Culver City and does not affect any Culver City intersection. However, a supplemental analysis honoring the comment's request was conducted to show that it would not affect the Draft EIR results. Assuming 40 people per bus, an AVO of 1.4 corresponds to 29 vehicle trips removed for each bus provided, rather than the 33 vehicle trips assumed in the traffic study. In response to the comment's request, a revised analysis was prepared. The only intersections affected by the change are the 12 intersections along Manchester Avenue, as shown in Figure 13 on page 172 of the traffic study. The revised analysis of Existing with Project with Mitigation conditions (year 2012) and Future with Project with Mitigation conditions (year 2022) are provided in Tables LAXN-AL07-7 and LAXN-AL07-8, respectively. Please see Appendix B of this Final EIR for additional traffic analysis tables. The addition of four vehicle trips (as a result of reducing the bus credit) at these intersections resulted in only modest changes to the final V/C ratios at these intersections, and did not change the significant impact assessment. Even with the reduced bus credit, all of the significant impacts identified on Manchester Avenue were reduced below the level of significance, both under Existing with Project with Mitigation conditions and Future with Project with Mitigation conditions. Please see Appendix B of this Final EIR for additional traffic analysis tables.

LAXN-AL07-12
Comment:

D. The DEIR Transportation Demand Management Discussion is Inadequate.
With respect to potential increases in transit travel time due to the Project, it should be noted that Table 17 shows that the Project trip generation estimates use 5% Transit Credit and 5% Transportation Demand Management ("TDM") credit. The question then arises as to the way in which these credits are derived and justified. The basis for and application of these credits needs to be more fully explained in the DEIR.

Further, the Project is taking 5% TDM credit on office and research & development. As transit is a critical component of TDM program, the detailed analysis on the Project's impacts to transit capacity should also include an appropriate portion of the trips claimed under the 5% TDM credit to calculate the full extent of the Project's impacts to transit capacity.

In addition, it is important that a Transportation Management Organization is established in order to ensure that the assumed traffic reduction attributable to the TDM measures is achieved.

Moreover, and despite the requirement that the efficacy of the TDM Program be monitored and the existence of fines for noncompliant tenants of the Project, enforcement of the TDM Program as a mitigation measure for Project impacts, will, ironically, result in increased impacts on Culver City. On the one hand, if the TDM Program is successful in diverting automobile traffic from the Project to public transit, demand on Culver CityBus lines, as on others, will increase over time. As growth in ridership on Culver City bus lines is already at 4% per year, it is most likely that Culver City will have to provide new buses to accommodate increased ridership from the Project. On the other hand, if the TDM is not as successful as anticipated in diverting traffic to public transit, then Culver City will be a recipient of increased surface traffic from the Project. Either way, Culver City is impacted in ways unanticipated, unanalyzed, and, therefore, unmitigated in the DEIR.

Additionally, the DEIR should be enhanced with respect to enforcement measures and should be expanded to include greater detail regarding the enforcement process.

Finally, since the mitigation benefits of the TDM Program are difficult to quantify (and the outcome not certain), the DEIR needs to provide a detailed analysis of the real travel time delays the buses along the corridors within the traffic study area will experience due to the Project without the TDM credit. This detailed analysis should include CCB Lines 1-7.

Response:

Table 4.14-13 on pages 4.14-95 and 4.14-96 of the Draft Environmental Impact Report shows the Project trip generation, including credits for transit usage and the TDM program. The 5% transit credit, applied to office, research and development, and community/civic uses on the Project Site, is based on a discussion with Los Angeles Department of Transportation (LADOT) staff within the guidelines set forth in Traffic Study Policies and Procedures (LADOT, revised August, 2014). As discussed on pages 10 and 11 of the LADOT Policies and Procedures, a Project can qualify for up to a 15% transit credit if it is located within one quarter mile of a transit station or Rapid bus stop and up to a 10% credit if it provides features to promote alternative travel modes (such as those proposed in the Project's TDM program). The Project is located near two Rapid bus lines in Santa Monica Big Blue Bus Rapid 3 and Culver City Bus Rapid 6, both of which have stops at the corner of Sepulveda Boulevard & Manchester Avenue, which is within one quarter mile from the northeast corner of the Project Site. Further, the Project would promote alternative modes of transportation through features such as the Paseo, a multi-modal pathway adjacent to Westchester Parkway to supplement the on-street bicycle lanes and the pedestrian sidewalk, and the provision of dedicated space for a future transit station. With these measures, in consultation with LADOT, a 5% transit credit was applied to the office, research and development, and community/civic uses. This is a conservative estimate of the percentage of Project patrons that may use transit to access the Project Site. Further, it was only applied to the land uses that typically employ people on a regular commuter schedule that is easily adapted to public transit. It was not applied to retail or recreational uses, nor to airport support uses.

The Project also was allowed to take a 5% credit for the same land uses for the implementation of a TDM program as part of the Project's traffic mitigation program. The TDM program is designed specifically to reduce peak period trip generation through measures that promote alternative modes of travel (public transit, walking, bicycling), carsharing or vanpooling, alternative work schedules that reduce peak period travel, telecommuting, and others. The TDM program has the potential to be much more effective than achieving a 5% trip reduction, but the traffic study conservatively only assumes a 5% credit. This TDM credit is far less than has been approved for other major projects in the area. Playa Vista, for example, took between 10-20% TDM credit for various land uses within its project. Universal Studios received a 10% TDM overall credit for its long-range master plan with over 20% TDM applied to its office land uses. Topanga

Village in Warner Center received an 11% TDM credit for employment-based land uses.

The comment also calls for the establishment of a Project TMO which has been added voluntarily to the Project by the Applicant. See Response to Comment LAXN – AL06 – 8 for a discussion of the Project TMO.

The comment states that the Project's transit capacity analysis take into account the trips expected to be reduced by the TDM program, as some of the vehicular trip reductions resulting from the TDM program would become additions to the public transit system. However, the transit capacity analysis already assumed that a total of 7.5% of the Project's person trips (based on 1.4 average vehicle occupancy) would use public transit, as shown in Table 26 on page 252 of the traffic study. Also, that includes 7.5% of all Project trips, not just those trips generated by the office, research and development, and civic/community uses. Based on the trip generation estimates shown in Table 4.14-13 on pages 4.14-95 and 4.14-96 of the Draft Environmental Impact Report, the Project's transit credit and TDM credit combined account for 154 morning peak hour trips and 141 afternoon peak hour trips. If all of those trips were assumed to take transit at a rate of 1.40 people per vehicle, this would result in 216 transit trips during the morning peak hour and 197 transit trips during the afternoon peak hour. In reality, many of the trips reduced by the TDM program would not increase transit ridership, because the TDM program encourages many ways to reduce peak hour automobile trip generation. In addition to encouraging transit usage, it encourages carpools and vanpools, alternative schedules and working remotely, and walking or bicycling to the Project Site. Therefore the actual transit ridership based on the transit and TDM credits would be lower than these estimates. In comparison, the transit capacity analysis assumed the Project would generate 211 morning peak hour trips (approximately equal to the worst-case calculation based on credits) and 267 afternoon peak hour trips (far more than the afternoon peak hour calculation based on credits). Therefore, the transit capacity analysis was conservatively high in its calculation of Project transit trips.

The comment states that the Project will result in impacts in Culver City because a successful TDM program would increase transit usage and an unsuccessful mitigation program will increase auto usage. Additional analysis in response to comments from Culver City has been included here, showing no additional impact to Culver City intersections or transit systems (see responses to comments LAXN-AL07-7, LAXN-AL07-8, LAXN-AL07-9, and LAXN-AL07-11). Small increases to transit ridership as a result of the Project's TDM program, spread over all of the transit lines serving the Project Site, would not be significant and would not require Culver City Bus to expand route capacity by adding buses. Similarly, if for some reason the TDM program were not effective and there was no reduction in vehicular trip generation as part of that mitigation measure, then traffic conditions in Culver City would match the Existing with Project conditions (year 2012) shown in Table 4.14-9 and the Future with Project conditions (year 2022) shown in Table 4.14-11 of the Draft Environmental Impact Report. The comment requests that the Project's TDM program be monitored to ensure that the trip reduction targets are met. The comment asks for more than is required by CEQA; "A public agency can make reasonable assumptions based on substantial evidence about future conditions without guaranteeing that those assumptions will remain true. (Pub. Resources Code, § 21080, subd. (e); *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 412, 183 Cal.Rptr. 898.)" Furthermore, the Coastal Transportation Specific Plan already contains an in-depth compliance and monitoring program which requires annual reporting to LADOT regarding the initiatives and results of the TDM program.[1] Nevertheless, the request is noted for the record and will be forwarded to the decision makers for review and consideration. Additionally, LAX is required to prepare detailed annual monitoring reports for the City of Los Angeles. As described in Response to Comment LAXN-AL07-9, the Project's traffic analysis complies with all applicable guidelines and analysis methodologies, and no additional analysis of intersections to assess potential travel time

delays is necessary.

[1] Coastal Transportation Specific Plan available online at: http://planning.lacity.org/complan/specplan/pdf/CTrans.pdf

LAXN-AL07-13
Comment:

In summary, Culver City seeks to be part of the solution to the problem of the impacts caused by the Northside Project. We look forward to further discussions with LAWA concerning disclosure and analysis of these impacts and appropriate mitigation for them, so we can reach an amicable and mutually beneficial resolution of these issues.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. LAWA will continue to work in good faith and within the constraints associated with federal revenue diversion to address comments from Culver City.

LAXN-PC01 **Edwart G. Keating** **None Provided** **5/20/2014**

LAXN-PC01-1
Comment:

I live right near what is labeled Intersection 92 in the draft EIR. The EIR is correct, in my opinion, that traffic impact in the vicinity of my home would be minimal. Further, it should be noted that residents of my neighborhood would generally be out-bound in the morning and in-bound in the evening, running exactly opposite to the prevailing direction of traffic for workers in the Northside Plan area.

Response:

This comment regarding the Draft EIR traffic impact analysis and general flow of traffic in the Project site vicinity is noted for the record and will be forwarded to the decision-makers for review and consideration.

The comment expresses support for the proposed Project. It specifically notes that the impact of project traffic near the intersection of Falmouth Avenue & Westchester Parkway would be minimal and generally opposite the direction of prevailing traffic during the peak hours. The comment is noted for the record, and no additional response is required.

LAXN-PC01-2
Comment:

I especially appreciate the fact that the plan includes no additional housing. Real estate experts I have talked to feel that having proximate jobs will increase residential property values in the area. My current residence could be quite attractive to someone working in the Northside Plan area.

Response:

This comment regarding exclusion of residential uses in the proposed Project is noted for the record and will be forwarded to the decision-makers for review and consideration.

LAXN-PC02 **Iggy Tester** **None Provided** **5/21/2014**

LAXN-PC02-1

Comment:

Please ignore. Testing long email address.

Response:

This comment does not pertain to the Draft EIR. No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public

Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-PC03 **Douglas C. Arseneault** **Valley Industry and Commerce Association** **5/27/2014**

LAXN-PC03-1

Comment:

We would like to schedule a presentation on the LAX Northside Plan for our next Land Use committee meeting on Tuesday, June 10 at 8 AM. The meeting will be held at The Garland hotel (4222 Vineland Ave. North Hollywood, CA 91602).

Please let me know if you or one of your colleagues is available.

Response:

LAWA presented to the Valley Industry and Commerce Association as requested in letter LAXN-PC03 on June 10, 2014. No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-PC04 **Patricia Smith** **None Provided** **6/8/2014**

LAXN-PC04-1

Comment:

Are hard copies of the draft EIR available for purchase. If so where can I pick one up.

Response:

LAWA responded to the comment inquiring where copies of the Draft EIR were available for public review. No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-PC05 **Grace Yao** **Loyola Marymount University** **6/11/2014**

LAXN-PC05-1

Comment:

Is there a meeting this evening at St. Bernard's HS on the Northside Plan?

Response:

LAWA responded to the inquiry to confirm that a public meeting would be held on June 11, 2014 at St. Bernard High School regarding the proposed Project. No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-PC06 **Mo Sadrpour** **None Provided** **6/11/2014**

LAXN-PC06-1

Comment:

This project needs to take a look at speed control on Loyola Street between Lincoln & Westchester Parkway.

One suggestion is to have a round about at intersection of Loyola and La Tijera (behind OTIS College).

Also since there are lots of students from Otis College & Elementary school cross Loyola there should be a cross walk at the Loyola & 91st or Loyola & La Tijera (behind OTIS College)

This is a very important safety issue that has been brought up many times during our meetings

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

The Project would not object to the installation of a crosswalk across Loyola Boulevard at 91st Street or a roundabout at the intersection of Loyola Boulevard and La Tijera Boulevard. If Otis, for example, expanded its campus to the west side of Loyola, a protected crosswalk or a roundabout would be required of them as part of its expansion. The exact location and configuration of the crosswalk or roundabout would depend on the anticipated pedestrian volumes and on the specific LADOT criteria governing the type and location of crosswalks. However, given that this is an existing problem (according to the comment) and not a Project-specific impact to pedestrian safety, and is not immediately adjacent to any Project Area, such an improvement should be implemented by adjacent property owners or developers. This has been added to the Project as Project Design Feature (PDF) T-16.

LAXN-PC07 **Nancy Gene W. Morrison** **None Provided** **6/11/2014**

LAXN-PC07-1

Comment:

I am concerned about planes being "waved off" when there is an emergency. With new construction how are planes that are waved off going to be able to circle around over the neighborhood with higher construction than no construction/buildings now on Westchester Parkway.

Planes loaded with passengers have flown right over my yard + house and I could see passengers + they could see me, as well.

In an emergency there must be enough room for airplanes to turn out of the way.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. Section 4.7 Hazards/Hazardous Materials of the Draft EIR evaluates airport-related hazards. As noted in Section 4.7.2.1.1 Federal regulations relating to Hazards/Hazardous Materials of the Draft EIR, Federal Aviation Regulation Part 77 "Objects affecting Navigable Airspace" provides navigable airspace criteria for airports and imaginary surface criteria for heliports. FAR Part 77 regulates safe, efficient use and preservation of navigable airspace. The proposed Project would be designed to prevent impacts on the functioning airfield. The proposed LAX Northside Design Guidelines and Standards seek to ensure that all future development is compatible with FAA regulations and the safe operation of aircraft at LAX today and into the future. The proposed LAX Northside Design Guidelines and Standards specify height restrictions designed to be compatible with safe aviation standards for each district. The goal of restricted building heights is to ensure that building heights comply with applicable FAA restrictions for the safety of individuals adjacent to an active airfield. In addition to height limits that comply with FAA Part 77, the proposed Project includes the following Project Design Feature (PDF):

- **PDF Hazards and Hazardous Materials (H)-1:** FAR Part 77 governs objects affecting navigable space. Proposed buildings heights would comply with these FAA

requirements. If any construction activities would meet the thresholds set in FAR 77 Sec. 9, the proposed Project would be required to notify the FAA. These include construction or alterations more than 200 feet above ground level (AGL), any construction or alteration exceeding certain slope requirements, construction or alteration at a public use airport listed in the Airport/Facility Directory, and several other thresholds. As LAX is listed as a public use airport listed in the Airport/Facility Directory, and the Project site falls within the LAX Plan, filing of notice of construction with the FAA would be required.

The proposed Project's allowable building heights would meet FAA requirements under FAR Part 77, Subpart C, which provides standards for determining obstructions to Air Navigation or Navigational Aids or Facilities and the FAA Interim Guidance on Land Uses Within a Runway Protection Zone Memorandum. In the case of an emergency, proposed Project building heights would comply with applicable FAA safety requirements.

LAXN-PC08 **Susan Barrett** **BuchalterNemer** **6/12/2014**

LAXN-PC08-1

Comment:

Has the comment deadline been extended beyond June 30?

Response:

LAWA responded to the inquiry to confirm that the public review period had been extended to July 21, 2014 in response to community requests for additional time to review the Draft EIR. No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-PC09 **Erin Wallace** **None Provided** **6/17/2014**

LAXN-PC09-1

Comment:

I have commented in the past about the moving the north runway closer to my community. In my mind, these two projects - Northside development and North runway expansion - are interdependent. If you move the runway, Westchester Parkway may be affected by the possible movement of Lincoln. This could block through traffic to the businesses you are proposing in the Northside development. If you move the runway, future businesses along Westchester parkway could be affected by moving the runway closer through noise and air pollution. It also seems possible these businesses would be within the required buffer zone. It seems to me that neither are a good idea, both together are a horrible idea, and it really should be a one or the other situation. To my knowledge there has not been a final decision on the runway project, therefore I am not sure how you can move forward on this project without knowing the outcome on the other.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. SPAS is a separate and independent project from the proposed Project. As noted in Section 2.3.1 LAX Plan, Specific Plan, and Master Plan of the Draft EIR LAWA initiated the LAX Specific Plan Amendment Study, or SPAS, in 2006 and the SPAS Report and EIR were adopted in 2013. SPAS identifies and evaluates potential alternatives to the projects which were previously analyzed as part of the LAX Master Plan Program that required further evaluation prior to implementation. SPAS did not change any of the land use regulations for the Project site. The SPAS does contemplate various alternatives that could include potential future realignment of Lincoln Boulevard as well as a shift in the LAX north runway. The proposed Project is consistent with both the existing alignment of Lincoln Boulevard and any potential future alignment.

Additionally, Appendix G of Appendix E Traffic Study of the Draft EIR contains an analysis of the proposed Project considering the various alternatives proposed within the SPAS EIR. As noted therein, implementation of the SPAS North airfield reconfiguration would change the configuration of some roadways, including Lincoln Boulevard, integral to the access patterns projected for the proposed Project. However, analysis of the proposed Project with the various SPAS alternatives yields similar significant impacts as analysis of the proposed Project without the SPAS. The Project as designed does not provide direct access to or from Lincoln Boulevard that could be affected by SPAS. Therefore, the proposed Project access points would be maintained should the SPAS be implemented.

Finally, the proposed Project heights, uses, and setback areas were designed to accommodate the potential runway moves contemplated by the SPAS alternatives. Should any of the SPAS alternatives be implemented, the proposed Project uses would not be located in areas required as buffers for safety reasons.

LAXN-PC10 **Nathanael Nerode** **None Provided** **6/17/2014**

LAXN-PC10-1

Comment:

This is a comment regarding the people mover and CONRAC proposals. The CONRAC proposal demolishes an entire neighborhood, which is not going to happen and is a mistake. The people mover proposal is asininely awful, and ignores best practices from other people movers -- it should be a loop through the terminals stopping at every terminal, like people movers are in every other airport in the entire world. I really wish LAX had an airport people mover and a consolidated rental car center, but YOU ARE DOING IT WRONG. Please redesign the people mover to be a loop through the terminals and relocate CONRAC onto one of the giant existing parking lots. Thank you.

Response:

This comment regarding the LAX people mover and Consolidated Rental Car Center, or CONRAC, projects is noted for the record and will be forwarded to the decision-makers for review and consideration. The LAX people mover and Consolidated Rental Car Center projects are not part of the proposed Project. No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-PC11 **Linda Ching-Ikiri** **None Provided** **6/20/2014**

LAXN-PC11-1

Comment:

I am the person who raised the issue about the 105 corridor competing with the El Segundo aerospace traffic. I am sorry that I forgot to mention that the bottleneck with be [sic] at the 405 north/105 west transition. Once drivers get on the 105, then they probably will have a clear path down Imperial to Pershing.

I think the traffic team may need to see for themselves the severity of the bottleneck. I have driven the 405 southbound at ~9:15 a.m. (Thursdays) and seen traffic on the other side gridlocked farther down the road than one would expect at that time of day. Also, my office overlooks the 105 and I can see the traffic trying to exit at Sepulveda in the mornings--horrific!

I can't remember how the alternate routes were ranked, but I'm sure those "letter grades" are bound to go down!

Response:

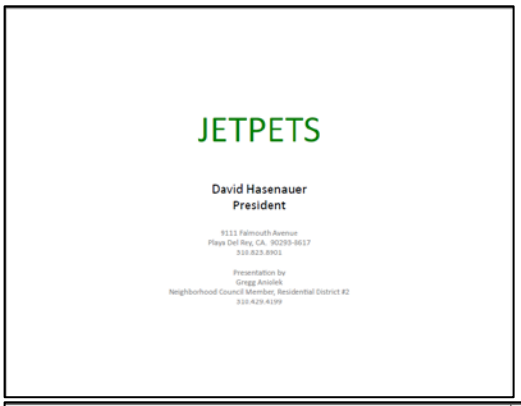
This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. The comment anecdotally states that there is heavy congestion on the connector ramp between I-405 northbound and I-105 westbound and on I-105 exiting at Sepulveda Boulevard during the morning commuter peak period. No specific complaint was made other than to suggest that the Project traffic consultants observe the congestion themselves. The Project is working with Caltrans staff to address the effects of Project traffic on the freeway system. No further response is required.

LAXN-PC12 **Gregg Aniolek** **None Provided** **6/23/2014**

LAXN-PC12-1

Comment:

I'm just following up with an electronic copy of my presentation I gave you last Thursday at the PLUC meeting.



Response:

This comment regarding potential inclusion of pony rides and additional uses in Area 1 of the Project site is noted for the record and will be forwarded to the decision-makers for review and consideration. The proposed Project allows open space and recreational facilities on Area 1, in conjunction with other uses that achieve fair market value. As noted in Table 2-2 of the Draft EIR, the Open Space and Recreation land use category allows active and passive recreation, including but not limited to golf course, play fields, soccer fields, baseball and softball fields, dog parks; buffer areas; below-grade stormwater treatment facilities; and parking (above and below ground). Animal boarding or petting zoos are not allowed by-right in this area as permanent housing for animals would have additional environmental impacts that were not disclosed or evaluated in the Draft EIR. Should a private entity wish to pursue establishment of a use such as a petting zoo or pony ride in Area 1, a Conditional Use Permit with additional review and environmental analysis would have to be requested.

The proposed Project would not impact existing fences in Area 1, however Project Design Feature Aesthetics (A)-15 prohibits chain link fences in the LAX Northside Center and LAX Northside Campus Districts.

LAWA does not have the authority to compel Jet Pets, a private business, to provide support for animal owners in the Project site vicinity or to provide public tours of their facilities.

No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-PC13 **Bryce Sheldon** **Integrated Services Corp** **6/25/2014**

LAXN-PC13-1

Comment:

My name is Bryce Sheldon, I represent Integrated Services Corp (ISC), a New York City hospitality procurement and construction management company specializing in 3, 4 and 5 star hotels, resorts and casinos. During the 27 years of our operations, we have successfully completed over 1,100 hospitality projects all over the world.

We would like to bring our expertise and assist you with your procurement and or Construction management needs for the LAX Northside Hotel in my home town of Los Angeles California.

I have attached our qualifications material for your review. We will be more then happy to

meet with you and your team. Please let me know if you have any questions and enjoy the rest of your week.

Response:

This comment regarding a hospitality procurement and construction management company is noted for the record and will be forwarded to the decision-makers for review and consideration. No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-PC14 **Ashley Wingate** **Complete Signs** **7/10/2014**

LAXN-PC14-1

Comment:

I noticed your involvement on a project on Construction Wire.

We're a national sign company, Complete Signs. Please find some info about us attached.

Our approach to managing your identity assures a streamlined project management process, uniform look and cost savings.

Please don't hesitate to let me know if I can put together a proposal for the exterior and interior signage for your construction project.

Please email me at ashley@completesigns.net or give me a call or text at 334-618-1361 if I can assist in anyway.

Response:

This comment regarding a national sign company is noted for the record and will be forwarded to the decision-makers for review and consideration. No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-PC15 **Dawn Goodwin** **None Provided** **7/16/2014**

LAXN-PC15-1
Comment:

I am adamantly opposed to the LAX Northside plan. LAWA has NOT been a good neighbor to the surrounding PDR community.

Response:

This comment regarding LAWA's relationship to the Playa del Rey community is noted for the record and will be forwarded to the decision-makers for review and consideration. No further response is required because the comment does not raise any environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-PC15-2
Comment:

To infer the noise levels would not increase for us directly behind Westchester Parkway is simply a fallacy.

Response:

Section 4.10 Noise of the Draft EIR discloses and evaluates noise impacts related to the proposed Project. Section 4.10 Noise of the Draft EIR does not infer that noise levels would not increase directly behind Westchester Parkway. While the proposed Project does increase noise due to construction and operation, impacts are not significant except for temporary construction noise. Ongoing operation of the proposed Project would not increase noise levels above thresholds of significance.

Table 4.10-12 and Table 4.10-13 disclose the Construction Phase Maximum Noise Level (dBA) and Change in Hourly Noise level During Construction Activities (dBA) at representative sensitive receptor locations located in close proximity to the Project site, including north of Westchester Parkway. As shown, construction activities do not contribute to noise in excess of ambient levels for all areas where noise was calculated, except Area 3, Area 12A, and Area 13. Noise increases in these Areas are significant based on the City of Los Angeles CEQA Thresholds Guide. The proposed Project includes mitigation measures MM- Noise (N) Northside Plan (NSP)-1 through MM-N (NSP)-5 to mitigate construction related noise. As discussed in Section 4.10.4.1 of the Draft EIR, implementation of these measures reduces noise to less than significant in Area 3, however significant temporary construction related impacts would remain in Area 12A East and Area 13 even after implementation of all feasible mitigation measures. No further feasible mitigation measures under LAWA's control are available.

Section 4.10.2.6.2 Operations of the Draft EIR discusses noise impacts related to the proposed Project. Existing measured ambient noise levels are compared to the presumed ambient noise levels for land uses included in the proposed Project. As discussed therein, the proposed Project land uses would not cause ambient noise to increase above levels of significance. Additionally, as shown in Table 4.10-23 and Table 4.10-24 of the Draft EIR, proposed Project traffic noise levels would cause an increase in noise of approximately 1.0 dBA to 4.0 dBA in the AM and PM peak hours. These noise level increases are below the threshold of significance.

LAXN-PC15-3
Comment:

Planes have been flying closer to the North for some time now. While my patio door was replaced, my windows were not and the noise levels continue to increase.

Response:

The proposed Project does not change the runway configuration or flight patterns at LAX, and therefore would not change noise related to aircraft activity. Additionally, as detailed in response to comment LAXN-PC15-2, Section 4.10 Noise of the Draft EIR discloses and evaluates noise impacts related to the proposed Project. Section 4.10 Noise of the Draft EIR does not infer that noise levels would not increase directly behind Westchester Parkway. While the proposed Project does increase noise due to construction and operation, impacts are not significant except for temporary construction noise. Ongoing operation of the proposed Project would not increase noise levels above thresholds of significance.

LAXN-PC15-4
Comment:

In addition, I am opposed to any development which would run along Westchester Parkway from Sepulveda to Pershing.

This is NOT a business district, this is a neighborhood.

Response:

This comment regarding opposition to any development along Westchester Parkway between Sepulveda Boulevard and Pershing Drive is noted for the record and will be forwarded to the decision-makers for review and consideration. As noted in Section

ES.1.1 of the Draft EIR, In 1984, the City of Los Angeles approved 4,500,000 square feet of commercial on the Project site. In 1989, LAWA prepared the Design Plan and Development Guidelines for LAX Northside to provide additional guidance on development of the Project site. The City of Los Angeles subsequently incorporated the 1984 entitlements and 1989 Design Plan and Development Guidelines for LAX Northside into later planning documents, including the adopted 2004 LAX Specific Plan. Therefore, existing City of Los Angeles planning and entitlement documents already designate the Project site for 4,500,000 square feet of commercial development and other uses. The proposed Project would reduce the total allowable square footage to 2,320,000 square feet while allowing a mix of employment, retail, restaurant, office, hotel, research and development, higher education, civic, airport support, recreation, and buffer uses that support the needs of surrounding communities and LAWA.

No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-PC16 **Keri Mallozzi** **SpotOn Networks** **7/16/2014**

LAXN-PC16-1

Comment:

Sign up for our next webinar: "WiFi Calling Is Here: The Impact on MDU/ MTUs"
Wednesday August 13, 2014 1 PM EST
Duration: 60 minutes

Get your property ready for WiFi calling! iPhone support for seamless WiFi calling is coming in fall and TMobile and Sprint both support WiFi calling on Android (and soon Apple) devices. You need to have property-wide WiFi coverage for your residents. Give residents with WiFi calling the ability to place calls from anywhere at your property where there is WiFi coverage!

Need 24/7 Managed WiFi for your property? Request a quote today! or call Keri Mallozzi: 203-523-5231

Response:

This comment regarding wireless internet service is noted for the record and will be forwarded to the decision-makers for review and consideration. No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-PC17 **Allen Offinitz** **None Provided** **7/17/2014**

LAXN-PC17-1
Comment:

1) While I understand the position that LAWA is in regarding development, I think a buffer between the north runway provides a good safety margin. The Westchester Parkway provides local residents an alternative to using Manchester Blvd. as East/West thoroughfare. Adding commercial development will only increase traffic in the area.

Response:

The comment notes that a buffer between the north runway (and, presumably, residences to the north) provides extra safety. It appears to suggest that development of the Project will reduce that buffer and therefore decrease safety to residents. However, one of the purposes of the Project, as described on page 19 of the LAX Northside Design Guidelines

and Standards (Rios Clementi Hale Studios, May 2014), is to provide a better buffer between LAX and the adjacent communities than the empty land that sits there now. As noted in Draft EIR Section ES.1.1.,LAWA acquired the Project site, which was once primarily single-family homes, in part using Federal Aviation Administration (FAA) grants which require the conversion of the Project site to compatible land uses in close proximity to airport operations at LAX. In 1984, the City of Los Angeles approved 4,500,000 square feet of commercial on the Project site. This commercial development was planned as an airport-compatible land use that could buffer existing residences from LAX. In 1989, LAWA prepared the Design Plan and Development Guidelines for LAX Northside to provide additional guidance on development of the Project site. The City of Los Angeles subsequently incorporated the 1984 entitlements and 1989 Design Plan and Development Guidelines for LAX Northside into later planning documents, including the adopted 2004 LAX Specific Plan. Therefore, existing City of Los Angeles planning and entitlement documents already designate the Project site for 4,500,000 square feet of commercial development and other uses. No more specific claim or concern is raised in the comment and therefore no direct response can be provided.

The comment also suggests that the addition of commercial development [as part of the Project] will increase traffic in the area, including on Westchester Parkway which is an alternative east/west arterial to Manchester Avenue. It is important to note that Westchester Parkway was originally constructed in 1993 as an early implementation of mitigation for the development of the LAX Northside property. Westchester Parkway has been very under-utilized ever since because, to this point, none of the development envisioned for the property ever materialized. In fact, the original plan for the property anticipated as much as 4.5 million square feet of development and as many as 4,421 afternoon peak hour trips to and from the Project site. The proposed Project would generate a total of 2,476 afternoon peak hour trips after the implementation of a transportation demand management program as part of the Project mitigation. Therefore, Westchester Parkway will only need to serve approximately 56% of the traffic from the originally anticipated development.

Therefore, while it is certainly true that traffic will increase on Westchester Parkway due to the Project, as suggested in the comment, the Project will simply add a portion of the traffic that Westchester Parkway was originally built to serve. Further, as shown in Table 4.14-11 on pages 4.14-68 through 4.14-78 of the Draft Environmental Impact Report, each of the six study intersections on Westchester Parkway adjacent to the Project Site (#17, Pershing Drive; #92, Falmouth Avenue; #94, Loyola Boulevard; #95, McConnell Avenue; #97, La Tijera Boulevard; and #99, Sepulveda Westway) are projected to operate at level of service A during both the morning and afternoon peak hours under Future with Project Conditions (Year 2022). Therefore, there is no significant impact resulting from the increase in traffic on Westchester Parkway as a result of the Project.

LAXN-PC17-2
Comment:

2) I commend the planner's decision to limit height to 60 feet. I assume that there have been marketing studies that indicate the area needs more office space and retail development. I am sure that no one wants to see vacancies and with Marina Del Rey to the north and the large retail complex on Sepulveda at Rosecrans, one wonders what retailers would want to locate near a busy airport?

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. The proposed Project's land uses and square footages are based on market analysis conducted by LAWA as well as community and stakeholder input. As noted in Section 2.1 Introduction of the Draft EIR, the current entitlements for the Project site permit up to 4,500,000 square feet of commercial development.

Consistent with current market demands, the proposed Project reduces the total allowed development to 2,320,000 square feet. The allowable uses and square footages are designed to respond to current and future market demands to avoid vacancies.

No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-PC17-3
Comment:

3) Finally, NO to the soccer field. A big YES to the dog park. While I am not a dog owner, I feel bad for the pet owners that only have a limited amount of grass along Manitoba Street and Falmouth to walk their dogs. I also think a play area for young families would be a much better use of the space rather than a soccer field. I see young Mom's having to play with their children on our tennis courts, since there is no other open space to allow them to run, skate or learn to ride their bicycles. With more young families residing in the condominium and apartment complexes in the area, I would think there would be much greater support from the local residents.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. The proposed Project land uses were developed through a series of design charrettes, open houses, and community leaders meetings held in 2012 and 2013 with community stakeholders. During these meetings, community members expressed support for open space and recreation uses including but not limited to soccer fields and dog parks. The proposed Project reflects this input. As noted in Section 2.3.1 of the Draft EIR, the primary uses allowed within the LAX Northside by the 2004 LAX Plan, the existing land use plan for the Project site, include: commercial development; office; light industrial; research and development; hotel and conference facilities; retail and restaurant uses; schools and community facilities; open space; bicycle paths; and greenway buffers. Although open space is listed as an allowable use, as noted in Table 4.9-2 of the Draft EIR, no square footage is allocated for open space uses in the LAX Specific Plan. Therefore, the proposed Project improves the possibility of providing open space by specifically designating locations on the land use map and allocating development square footage for open space.

No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-PC18 **Janet Okawa** **None Provided** **7/17/2014**

LAXN-PC18-1

Comment:

This is in regard to the Draft EIR for the LAX Northside Plan. I live at Manitoba West located on Manitoba Street. It is my understanding there are plans to either have a dog park or soccer field located on the parcel located on Westchester Parkway and Falmouth Street.

My preference would be to select a dog park, since there are a lot of people in the neighborhood that own dogs and would have a park to walk their pets. If a soccer field was located on that parcel, I believe it would bring a lot of outside traffic to the neighborhood, more noise, and litter. I think the dog park would better for the area because it would draw a majority of the people from the surrounding neighborhood.

Response:

See response to comment LAXN-PC17-3. Section 4.14 Traffic of the Draft EIR calculated trips for the proposed Project assuming that both a dog park and playing fields would be developed. As shown in Table 4.14-8 Conceptual Land Use Program Trip Generation, for purposes of modeling traffic and determining related impacts dog parks and playing fields are assumed to generate peak hour trips at the same rate.

Additionally, as discussed in Section 4.10.2.6.2 of the Draft EIR, the proposed Project would include a 20-foot buffer and 80-foot setback in Area 1 and a 100-foot buffer and 20-foot setback in Area 2. New open space and recreation uses are allowed in Area 1 and in Area 2, however no recreational uses would be allowed in buffer and setback areas. Buffers and setbacks would separate noise generating uses from sensitive receptors. The existing ambient noise levels in these areas ranges from 65 CNEL to 70 CNEL due to existing aircraft noise exposure and measured existing ambient noise levels range from 59.7 L_{eq} dBA to 70.7 L_{eq} dBA. Introducing a soccer field to this area with presumed ambient noise ranging from 55 dBA L_{eq} to 60 dBA L_{eq} would not cause ambient noise to increase such that noise significance thresholds would be exceeded.

LAXN-PC19	**Mo and Bonnie Sadrpour**	**91st Street Neighborhood**	**7/17/2014**

LAXN-PC19-1
Comment:

Our 91 Street Neighborhood is directly North of the LAX Northside. The alley South of our homes is the LAX property boundary. We appreciate the opportunity to respond to the proposed LAX Northside Project. Our 91 Street homes, our lives, our neighborhood's future is critically and directly impacted by this plan. We look forward to actively continue our relationship with The LAX Planning Committee.
Upon reviewing the LAX Northside Plan EIR and its impact to our 91 Street Neighborhood, our most important security concerns have been addressed and mitigated with the proposed "strong" buffer.

Response:

This comment regarding support for the proposed Project buffer is noted for the record and will be forwarded to the decision-makers for review and consideration.

LAXN-PC19-2
Comment:

Security and safety go hand in hand. Our current issues are with the volume of traffic, the speed of traffic through the neighborhood streets (cut-through traffic has been a major problem before when Westchester Parkway was under construction). Pedestrian traffic should have marked/painted zebra crosswalks for the number of students attending the neighborhood schools, including Otis College. Steps should be taken by The Project Planning Committee to create mitigations to reduce the speed of traffic, create safe routes for pedestrian traffic, limit access from Loyola and provide controlled access, provide lighted, zebra crosswalks for pedestrian traffic, and clearly provide safe riding for bicyclists.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. With regard to neighborhood cut-through traffic during Westchester Parkway construction over 20 years ago, it is important to note that the Project would not result in an impact to neighborhood streets due to cut-through traffic. A complete neighborhood intrusion impact analysis was prepared and is found on page 4.14-83 of the Draft EIR. Due to the size of the Project Site and the likelihood that the various Project Areas will be built out intermittently, Project construction would only result in temporary and minor, if any, loss of travel capacity on Westchester Parkway. Project construction would not cause enough delay on Westchester Parkway to entice drivers to

cut through the adjacent residential neighborhoods to reach their destination. Further, the Project's construction traffic management plan is required which will help to minimize the effects of Project construction on the neighborhood.

The Project includes a comprehensive set of guidelines to enhance pedestrian and bicycle mobility around the Project Site, as detailed in the LAX Northside Design Guidelines and Standards (Rios Clementi Hale Studios, May 2014) (the "Design Guidelines"). Among those, the Project would include a "Paseo" adjacent to the existing sidewalk on the north side of Westchester Parkway. The Paseo would provide for various types of pedestrian-oriented recreation, and would include limited driveway breaks, lighting for safety, and crosswalks at all street crossings. Additionally, the Design Guidelines also require pedestrian amenities that "promote safe, visually pleasing, and comfortable pedestrian environments" (page 78). However, the list of improvements suggested in the comment are not warranted by the findings of the Draft EIR, as it concluded that the Project would have a less-than-significant impact on neighborhood streets.

Refer also to Response to Comment LAXN-PC06-1.

LAXN-PC19-3
Comment:

Public parking, for the designed recreational use of the Northside, needs to provide for the mixed uses planned to create additional public recreation areas – bicycle traffic, after school sports team traffic, pedestrian traffic, work traffic, to name a few – and, again, security and safety concerns must be thoughtfully planned and implemented. This is very crucial. Having designated parking will eliminate the neighborhood being used for recreational and added through traffic.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. Please refer to Response to Comment LAXN-PC19-2 for more information about the pedestrian orientation of the LAX Northside Design Guidelines and Standards (Rios Clementi Hale, May 2014).

Additionally, the comment suggests that designated on-site parking would reduce neighborhood cut-through traffic from the recreational uses. The Project will comply with all City of Los Angeles Municipal Code parking requirements. Additionally, much of the use of recreational facilities falls outside of the typical work day, and there will likely be many opportunities for nearby office and/or research and development facility parking lots built as part of the Project to be used during non-work hours for recreational users. Because Project access points – including parking lots – are oriented away from neighborhood streets, trips generated by the recreational uses – just like trips for the other Project land uses – would not travel through the neighborhoods to reach the Project site.

LAXN-PC19-4
Comment:

Most of 91st Street does run parallel to Manchester. 91St Street is and has previously been used as a major thoroughfare. Access control to the development from 91 Street, Loyola, La Tijera, and Lincoln needs to be studied further.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. However, 91st Street does not provide a viable cut-through route to get to any part of the Project faster than using non-residential streets, especially Westchester Parkway which is projected to operate at level of service A all along the Project Site under Future with Project Conditions (Year 2022), as shown in Table 4.14-11 on pages 4.14-68 through 4.14-78 of the Draft Environmental Impact Report. Westchester

Parkway provides direct and primary access to the Project Site at various locations, and is a four-lane divided arterial with a speed limit of up to 50 miles per hour and no stops. On the other hand, 91st Street – which indirectly connects Loyola Boulevard to Manchester Avenue and Falmouth Avenue – requires driving more than 1 mile at residential speeds, passing over four speed humps near Loyola Boulevard, and stopping at up to seven stop-signs. At no point along that route does it offer access to the Project Site. Project traffic is not expected to utilize the streets in the adjacent residential neighborhood.

LAXN-PC19-5
Comment:

Our other major concern is that during the development and construction period, we will be faced with rodents and pests from the field. REQUEST: Rodent and Pest control continuously during all construction and for the entire construction time. REQUEST: Dust control measures during construction to include resources for car cleaning/washing and other nuisances caused by construction. REQUEST: Noise control measures continuously during the entire construction time. REQUEST: green 8-foot security fence on buffer area, north of Northside Project and South of 91 Street alley. REQUEST: Continued and ongoing maintenance of buffer area during all construction and as a responsibility of future Northside occupants. REQUEST: Detailed plans to control and mitigate the increased traffic on 91 Street. REQUEST: Security and Safety for all.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. As noted in Table 4.3-4 Wildlife Species Observed within the Biological Resources Study Area of the Draft EIR, no rodents or pests were observed within the Biological Resources Study Area during field investigations. As such, construction activities are unlikely to drive rodents and pests into adjacent neighborhoods. No additional mitigation measures are needed, however LAWA has committed to the following additional Project Design Feature:

- **PDF B-18:** The proposed Project contractor shall utilize integrated pest/rodent management measures wherever feasible during construction in the LAX Northside Campus District, including efforts such as using pest-resistant or well-adapted native plant varieties; removing weeds by hand and avoiding the use of chemical pesticides, herbicides, and fertilizers; and maintaining the construction site free of unsealed food or open trash that could attract rodents.

Please see Chapter 3.0 of the Final EIR for Corrections and Additions to the Draft EIR.
As noted in Section 4.5.3.3.1 LAX Master Plan EIS/EIR Commitments related to geology/soils, LAX Master Plan MM- Air Quality (AQ)-2: Construction Related Measure requires numerous specific actions to reduce fugitive dust, including:

- Apply non-toxic soil stabilizer to all inactive construction areas (i.e., areas with disturbed soil).
- Following the addition of materials to, or removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing non-toxic soil stabilizer.
- Post a publicly visible sign with the telephone number and person to contact regarding dust complaints; this person shall respond and take corrective action within 24 hours.
- Prior to final occupancy, the applicant demonstrates that all ground surfaces are covered or treated sufficiently to minimize fugitive dust emissions.
- All roadways, driveways, sidewalks, etc. being installed as part of project should be completed as soon as possible; in addition, building pads should be laid as soon as possible after grading.
- Pave all construction access roads at least 100 feet on to the site from the main road.

As shown in Table 4.2-8 Peak Daily Construction Emissions of the Draft EIR, emissions related to PM_{10} and $PM_{2.5}$, which include dust, are less than significant for peak construction days. No additional mitigation or Project Design Features are needed.

As noted in Section 4.10.2.5.1 LAX Master Plan EIS/EIR Commitments related to noise of the Draft EIR, LAX Master Plan mitigation measures MM Noise (N)-7, MM-N-8, MM-N-9, MM-N-10, Surface Transportation (ST)-16 require preparation of a construction noise control plan, construction staging away from noise-sensitive uses as feasible, replacement of noisy equipment when technically and economically feasible, construction staging to avoid sensitive times of day, and designating haul routes away from sensitive noise receptors. Additionally, as noted in Section 4.10.2.5.2 Project Design Features relating to noise of the Draft EIR, the proposed Project includes setback and buffer requirements that would separate construction activities from noise-sensitive receptors. Significant construction related noise impacts occur in Area 3, Area 12A East, and Area 13. Therefore the proposed Project includes MM N (NSP)-1, MM N (NSP)-2, MM N (NSP)-3, MM N (NSP)-4, and MM N (NSP)-5 which require a continuous impermeable sound barrier whenever construction activities occur within 250 feet of noise sensitive receptors, that construction equipment be shut off during idling within 250 feet of noise sensitive receptors, that power construction equipment be equipped with noise shielding and muffling devices, that stationary construction equipment be located at the greatest distance possible from sensitive land uses and that unnecessary idling be prohibited, and that loading and unloading of heavy construction materials be located on-site and away from noise sensitive uses to the extent feasible. With these measures, significant temporary construction related impacts remain in Area 12A East and Area 13, however they are reduced to a less than significant level in Area 3. No further feasible mitigation measures under LAWA's control are available.

As noted in Section 4.12.2.3.3 LAX Master Plan Commitments and Project Design Features related to public services of the Draft EIR, per PDF Public Services-Police (PSP)-8, the proposed Project Buffer Areas are required to be secured by a ten foot tall fence and are not publicly accessible. Additionally, as noted in Section 4.1.3.3.2 Project Design Features related to aesthetics of the Draft EIR, PDF Aesthetics (A)-12 through PDF A-17 require fences to include planting strips, landscaping, be designed with both sides articulated and with similar or complementary materials and colors as the primary building, and not include chain link, corrugated metal, or barbed/razor wire. Therefore, the comment regarding security fencing is addressed by the proposed Project.

The LAX Northside Design Guidelines and Standards require ongoing maintenance. As noted in Section 07.2 and Section 09.3 of the LAX Northside Design Guidelines and Standards, landscaping and signage must be regularly maintained. No additional mitigation or Project Design Features are needed.

As shown on Figure 04.1.2 Circulation and Access of the LAX Northside Design Guidelines and Standards, no access is provided onto the Project site from 91st Street. Additionally, as shown on Figure 4.14.-2 Project Trip Distribution of the Draft EIR, proposed Project trips are not anticipated to be concentrated along 91st Street. Figures 4.14-3 and 4.14-4 of the Draft EIR depict Existing with Project Conditions Measured Against Existing Conditions Locations of Significant Intersection Impacts and Future with Project Conditions Measured Against Future Without Project Conditions Locations of Significant Intersection Impacts. As shown, no significant intersection impacts occur on 91st Street. Finally, as noted in Section 4.14.3.4.3 Neighborhood Streets of the traffic section of the Draft EIR, based on LADOT's standard criteria, no potential neighborhood intrusion impacts are identified. No additional mitigation or Project Design Features are needed.

As noted in Section 4.12.2.3.4 Project Impacts related to public services of the Draft EIR, the proposed Project would have less than significant impacts on police service during construction and operation. No additional mitigation or Project Design Features are needed.

LAXN-PC20 **Richard J. Sauschuck** **None Provided** **7/19/2014**

LAXN-PC20-1
Comment:

As a home owner I am aganist a soccer field being constructed in area (1) next to the jet pet's service road.

Response:

See response to comment LAXN-PC17-3.

Additionally, as shown in Table 2-2 of the Draft EIR, the Open Space and Recreation land use category includes active and passive recreation, including but not limited to golf course, play fields, soccer fields, baseball and softball fields, and dog park. Figure 2-6 of the Draft EIR depicts an Illustrative Site Plan that represents a reasonably foreseeable development scenario, however any of the allowable uses listed in Table 2-2 of the Draft EIR could be developed in the areas designated on Figure 2.6, Proposed Land Use Plan.

LAXN-PC20-2
Comment:

Building a soccer field in the back yard next to thee (3) largest condo compexes in P.D.R.Seagate Village, Manitoba West, Pacific Club would cause.
1.Noise pollution to the condo Homeowner's unit's.

Response:

Table 4.10-12 and Table 4.10-13 disclose the Construction Phase Maximum Noise Level (dBA) and Change in Hourly Noise level During Construction Activities (dBA) at representative sensitive receptor locations located in close proximity to the Project site. As shown, construction activities do not contribute to noise in excess of ambient levels in Area 2 where open space and recreation uses, which could include soccer fields, would be allowed.

As discussed in Section 4.10.2.6.2 Operations of the Draft EIR, the proposed Project would include a 20-foot buffer and 80-foot setback in Area 1 and a 100-foot buffer and 20-foot setback in Area 2 where new open space and recreation uses are allowed. These buffers and setbacks would separate noise generating uses from sensitive receptors. The existing ambient noise levels in these areas ranges from 65 CNEL to 70 CNEL due to aircraft noise exposure and measured existing ambient noise levels range from 59.7 L_{eq} dBA to 70.7 L_{eq} dBA. Introducing a soccer field to this area with presumed ambient noise ranging from 55 dBA L_{eq} to 60 dBA L_{eq} would not cause ambient noise to increase such that noise significance thresholds would be exceeded.

LAXN-PC20-3
Comment:

2.Overflow of street parking on Falmouth & Manitoba Street.

Response:

Parking specifically for the recreational uses – including the soccer fields – would be provided as required by the City at such a time as those areas were developed. However, soccer fields are typically used on weekends and late afternoons on weekdays. As described on page 4.14-91 of the Draft Environmental Impact Report, the recreational uses of the Project are anticipated to be located adjacent to office and research and development uses, which would provide large numbers of parking spaces. Because these commercial developments have minimal parking demand on weekends and late afternoons on weekdays, their parking lots would be available for use by visitors to the

recreational uses through a shared parking agreement.

Through the shared parking agreement, there would certainly be plenty of available off-street parking to accommodate visitors to the recreational uses. However, to the extent that on-street parking on Falmouth Avenue or Manitoba Street is permitted, the Project cannot prevent visitors from parking on those streets. Typically, the visitors would park where it is most convenient (i.e., shortest walking distance). In reviewing a map of the area and the Project land use plan (see Figure 2-5 on page 2-16 of the Draft Environmental Impact Report), it appears unlikely that visitors to the recreation area would park on Manitoba Street as it is located nearly 800 feet north on Falmouth Avenue. It is possible, and even likely, that visitors may park on Falmouth Avenue adjacent to the recreational areas and, to a lesser extent, further north than the recreational areas adjacent to residential apartments. It is entirely appropriate that recreation area visitors would park on Falmouth Avenue adjacent to the Project Site (and in fact, that stretch of Falmouth Avenue does not currently permit overnight parking, and therefore is not usable by residents to the north). It is expected that the majority of the remaining visitors to the recreation areas would park in office parking lots built as part of the Project. Should overflow parking in front of residential areas become an issue, residents could petition to form a preferential parking district which would limit on-street parking in front of residences to vehicles with valid parking permits.

LAXN-PC20-4
Comment:

3.Quality of life would be damaging to the Home owner's of these Condo Complex's.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-PC20-5
Comment:

4.Property Value would be effective [sic] due to noise..

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. See response to comment LAXN-PC20-2.

LAXN-PC20-6
Comment:

5.Our property would be over looking public rest roooms [sic] that smell.

Response:

As discussed in Section 4.2.3.4.2 Localized Air Quality Impacts of the Draft EIR, according to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed Project does not include any uses identified by the SCAQMD as being associated with odors. As the proposed Project activities do not include these sources of odors, potential odor impacts would be less than significant. Additionally, as shown in Table 4.1-2 LAX Northside Campus District Project Design Features, uses in Area 1 are separated from sensitive receptors with a 20-foot buffer and 80-foot setback and uses in Area 2 are separated from sensitive receptors with a 100-foot buffer and 20-foot setback in Area 1. Public restrooms would not be located such that existing residences would overlook them.

LAXN-PC20-7
Comment:

Homeowner's in this area are being subjected to noise from Saint Bernard's athletic field and their parking lot (7) days a week. The school is leasing out their athletic field to events from 8am to 530pm and their parking lot to the motion entertainment industry. The condo owner's do not need more noise from 150 soccer fan's screaming in our back yard.

Response:

Saint Bernard High School is an existing use that is outside of the Project site. LAWA does not have authority to limit uses at Saint Bernard High School. See response to comment LAXN-PC20-2.

LAXN-PC20-8
Comment:

Area (1) east of Saint Bernards high would be the proper place for the contruction for the soccer field, the noise would be far away from the Homeowner's.

Also, area (1) on the jet pet's service road has been used by dog walker's for the last (30) year's by Playa Del Rey resident's, I strongly support a dog park to be construted ther, not a soccer field.

Response:

See response to comment LAXN-PC-20-2.

Additionally, as shown in Table 2-2 of the Draft EIR, the Open Space and Recreation land use category includes active and passive recreation, including but not limited to golf course, play fields, soccer fields, baseball and softball fields, and dog park. Figure 2-6 of the Draft EIR depicts an Illustrative Site Plan that represents a reasonably foreseeable development scenario, however any of the allowable uses listed in Table 2-2 of the Draft EIR could be developed in the areas designated on Figure 2.6, Proposed Land Use Plan.

LAXN-PC21 **Danna Cope** **None Provided** **7/20/2014**

LAXN-PC21-1
Comment:

The amount of outreach to the community and incorporation of comments and concerns that has been achieved through this DEIR process is outstanding and very much appreciated.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-PC21-2
Comment:

However, there are a few issues that need clarification.

Using 2010 traffic data is not appropriate for this study. In 2010 this area was still in the throes of a recession. Since 2010 there has been a substantial upsurge in traffic, especially in the Westside and South Bay sections of Los Angeles County. Even since 2012 there has been a sizeable traffic increase in these areas over and above the increase in the rest of Southern California. Therefore, using an increase of 1.7% does not adequately reflect the actual traffic in this area as of 2014 (DEIR Executive Summary, page 4.14-16, discussion of Table 4-14-3). A new traffic study showing the actual, current traffic is required.

Response:

The traffic study was conducted in consultation with the Los Angeles Department of Transportation (LADOT) and in accordance with *Traffic Study Policies and Procedures* (LADOT, May 2012, revised August 2014). LADOT's requirements regarding traffic counts to be used in a traffic study have not changed since the beginning of the preparation of the traffic impact report for the LAX Northside Project. They specify that a traffic study should use traffic counts that are not more than two years old. LADOT's practice allows for counts less than two years old when the planning process begins – either at filing of the Project's Notice of Preparation or when the traffic study Memorandum of Understanding (an agreement on traffic study assumptions between the Applicant (or the Applicant's consultant) and LADOT)) is signed. The Project's Notice of Preparation was filed on April 4, 2012, and the traffic study Memorandum of Understanding was signed by LADOT on June 21, 2012. Most of the traffic counts used in the traffic study were collected in July, 2010, less than two years before either the filing of the Notice of Preparation or the signing of the Memorandum of Understanding.

It is important to note that the California Environmental Quality Act (CEQA) requires analysis of existing conditions *at the time the Notice of Preparation is filed*. Therefore, the analysis of existing conditions in the traffic study is based on an analysis year of 2012, and despite the name of "Existing Conditions" does not represent year 2014 conditions (the year the Draft Environmental Impact Report was released for public review and comment).

It is also important to note that the 1.7% growth described in the Draft Environmental Impact Report was the average growth across the entire study area – it was not applied equally to all intersections or all movements of intersections. Many movements were expected to increase a much higher percentage – as high as 50% in one case. The percent traffic growth between the year 2010 traffic counts and the year 2012 Existing Conditions analysis was based on the LAX travel demand forecasting model (LAX Model), the most comprehensive and state of the art traffic planning tool for the area. The LAX Model is a focused version of the City of Los Angeles Transportation Strategic Plan travel demand forecasting model, which is itself a focused version of the Southern California Association of Governments (SCAG) regional travel demand model. Therefore, traffic growth between the count year and Existing Conditions was appropriately modeled for use in the traffic study.

LAXN-PC21-3
Comment:

The traffic studies used in the DEIR did not include ongoing development at Playa Vista which will heavily impact the flow of traffic on Lincoln Blvd and needs to be factored into the Final EIR traffic figures. The approved large apartment complex at 74th Street and La Tijera Blvd was missing from the DEIR listing of other proposed projects. It will add greatly to the slowing of traffic at the 405 Freeway on and off ramps at La Tijera as well as other intersections and needs to be included in the Final EIR.

Response:

As described in detail in Response to Comment LAXN-AL07-8, the Project's traffic study took into account both known related projects and long-term future developments that were included in the LAX Traffic Model, which was used to forecast Future without Project (year 2022) conditions. The related projects list, included as Table 9 of the traffic study (*Transportation Study for the LAX Northside Plan Update,* Gibson Transportation Consulting, Inc., May 2014, provided as Appendix E to the Draft Environmental Impact Report), will be updated to reflect the related projects noted in the comment. The addition of Playa Vista as a related project does not change any conclusions in the Draft EIR. Please see Chapter 3.0 of the Final EIR for Corrections and Additions to the Draft EIR.

LAXN-PC21-4
Comment:

The DEIR states that there will be 15 intersections rated as poor or LOS E at peak hours (4 AM and 11PM) and 14 intersections as failed or LOS F at peak hours (3 AM and 11 PM) with mitigation measures (Traffic Appendix, Table 20, page 228). This represents an increase of 6 LOS E and 8 LOS F intersections (comparing Traffic Appendix, Table 5, page 45 and Table 20, page 228). These intersections are the same ones funneling traffic into LAX; impeding the traffic flow into and around the airport should not be the result of the LAX Northside development. More mitigation measures must be created or the density of the plan should be reduced.

Response:

The comment incorrectly states that LAX Northside would result in 6 additional LOS E intersections and 8 additional LOS F intersections within the Study Area. The comment compared Existing Conditions in year 2012 to Future with Project with Mitigation Conditions in year 2022, which is in fact a measure of the cumulative effect of all projected traffic growth in the area over a 10-year period – not just Project traffic. In order to properly make the comparison that the comment attempts to make, it is important to isolate the Project itself by comparing the Future without Project Conditions to the Future with Project with Mitigation Conditions, both year 2022 analyses.

The Future without Project Conditions are shown in Table 4.14-11 on pages 4.14-68 through 4.14-78 of the Draft Environmental Impact Report. They indicate that during the morning peak hour, 4 intersections would operate at LOS E and 2 would operate at LOS F. During the afternoon peak hour, 10 intersections would operate at LOS E and 10 intersections would operate at LOS F.

The Future with Project with Mitigation Conditions are shown in Table 4.14-15 on pages 4.14-114 through 4.14-121 of the Draft Environmental Impact Report. They indicate that during the morning peak hour, 4 intersections would still operate at LOS E and 3 would operate at LOS F (an increase of one intersection operating at LOS F). During the afternoon peak hour, 11 intersections would operate at LOS E and 11 intersections would operate at LOS F (an increase of one intersection operating at LOS E and one operating at LOS F).

In total, 22 intersections would operate at LOS E or F during at least one peak hour under Future without Project Conditions and 24 intersections would operate at LOS E or F during at least one peak hour under Future with Project with Mitigation Conditions, which is far less of an increase than cited in the comment. The two intersections are #30, Sepulveda Boulevard & Westchester Parkway, and #33, Sepulveda Boulevard & I-105 Westbound Ramps, both of which are identified as significantly and unavoidably impacted by the Draft Environmental Impact Report.

The comment states that the Project should be reduced so as not to impede the traffic flow into and around the airport. However, the development of the Project Site at any density is likely to result in a net increase in traffic in the vicinity of the airport, since the airport is adjacent to the Project Site. It is up to the decision makers at the City to determine whether the benefits of developing the Project outweigh the potential impacts as identified within the Draft Environmental Impact Report.

LAXN-PC21-5
Comment:

It would be beneficial if a summary table, similar to Table 20, were to be included that listed the levels of service for existing conditions, the project without mitigation, and the project with mitigation.

Response:

At the request of the comment, Table LAXN-PC21-1 provides a summary of intersection levels of service for each peak hour in each of the 6 analyzed scenarios. Please see Appendix B of this Final EIR for additional traffic analysis tables.

LAXN-PC21-6
Comment:

After mitigation measures, the total weekday number of project trips is expected to be 23,126. Less than 19% (1,935 AM, 2,476 PM for a total of 4,411) are considered to be peak hour trips per day out of the total 23,126. Because a large portion of the development will be office space with weekday operations and some of the retail, recreational, and commercial traffic will also be during peak hours, 19% is far too low.

Response:

The comment incorrectly states that it is unrealistic that only 19% of the total daily trips occur during the morning and afternoon peak hours combined. The comment seems to assume that all office traffic occurs during the morning and afternoon peak hours, which is a misunderstanding of the concept of the peak hour. The peak hour is simply the busiest single hour of the morning or afternoon, not to be confused with the peak period, which is a period of several hours generally considered to be "commuter" hours. For example, approximately 10.7% of the daily trips to and from the Project Site are expected to occur during the afternoon peak hour (2,476 PM peak hour trips divided by 23,126 daily trips). If that peak hour is, for example, 5 PM to 6 PM, it is expected that the hours from 4 PM to 5 PM and from 6 PM to 7 PM have similarly high trip generation, though slightly less than during the actual peak hour from 5 PM to 6 PM. Therefore, far more than 19% of the daily trip generation is expected to occur during the commuter peak *periods*.

Further, the trip generation estimates are based on rates from the Institute of Transportation Engineers' (ITE) *Trip Generation, 8th* Edition (2008), and are based on a compilation of trip generation surveys of existing land uses all over the country. These rates are used in nearly every traffic study in Los Angeles, and are the most practical and defensible source of trip generation data available.

LAXN-PC21-7
Comment:

Traffic mitigation must: include new transportation systems, improve traffic signage and lights, be affordable for riders/drivers, serve more than the project area, interlink with existing transportation services, protect the residential areas, and accommodate pedestrians, bicycles, and the handicapped.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. Traffic mitigation measures are implemented to reduce identified significant traffic impacts. Thus, the types of mitigation measures implemented and the scope of the overall mitigation program is determined by the Project's significant impacts. Under the California Environmental Quality Act (CEQA), a project is required to provide mitigation, where feasible, to reduce identified impacts to a level of insignificance. A project is not required to mitigate beyond those impacts identified as significant. It is not clear what the comment is requesting by "new transportation systems" or what aspect of the mitigation program must "be affordable for riders/drivers," since the traffic mitigation program does not impose any costs on drivers except to the extent that new buses integrated into an existing Metro bus route would still require payment of the standard bus fare to ride. However, the remainder of the things on the comment's list are already part of either the Project's design or its mitigation program, as follows:

- Improve traffic signage and lights – To the extent that new or improved wayfinding signage may be warranted or required with the Project's implementation, they would

be installed during construction of the buildings necessitating the signage. A number of traffic signals (we presume the comment's reference to "lights" means traffic signals) would be improved as part of the Project. As described on pages 4.14-97 through 4.14-100 of the Draft Environmental Impact Report, the Project would pay for right-turn detection systems or other vehicle detection loops, upgrades to signal controllers, and/or installation of closed circuit television cameras to monitor traffic at a number of locations both within Los Angeles and Inglewood.

- Interlink with existing transportation services – As described on page 4.14-100 of the Draft Environmental Impact Report, the Project would pay to provide two additional buses for Metro Route 115 along Manchester Avenue to increase the frequency of the existing transit service. It would also set aside space on the Project Site – identified in consultation with Metro and the Los Angeles Department of Transportation – for the potential future development of a transit station. Additionally, the Project's transportation demand management (TDM) program would provide information about and coordination with existing transit services to help promote alternative modes of travel to and from the Project Site.

- Protect the residential areas – The Project is designed so that all access fronts Westchester Parkway, Loyola Boulevard, or La Tijera Boulevard along Project frontage. There would be no direct Project access – either vehicular or pedestrian – to the residential neighborhoods to the north. Further, a 100-foot landscaped buffer would be constructed at the northern edge of Area 2 between the development on Area 2 and the residential neighborhoods. No neighborhood intrusion impacts were identified in the Project's traffic study because it is unlikely that Project traffic would travel on residential streets to reach the Project Site rather than using Westchester Parkway, which is projected to operate at LOS A all along the Project frontage even under Future with Project Conditions (as shown in Table 4.14-11 on pages 4.14-68 through 4.14-78 of the Draft Environmental Impact Report).

- Accommodate pedestrians, bicycles, and the handicapped – One of the primary design features of the proposed Project is the Paseo, a 22-foot wide multi-use landscaped recreational pathway (including the existing sidewalk on the north side of Westchester Parkway) located along the length of Westchester Parkway along the Project frontage. The Paseo will serve joggers, walkers, handicapped persons, and children. The adjacent on-street bicycle lanes, which are not part of the 22-foot wide Paseo, will continue to accommodate bicyclists. Additionally, all aspects of Project design would be compliant with the Americans with Disabilities Act, and would be handicapped-accessible.

LAXN-PC21-8
Comment:

The intersection of Sepulveda Blvd and Westchester Parkway is the first opportunity northbound traffic on Sepulveda will have to enter the LAX Northside area by making a left turn onto Westchester Parkway. It is already a dangerous spot for pedestrians and has the potential for traffic waiting to make the left turn to back up into the northbound Sepulveda traffic, especially in the AM peak hours. There are two very highly utilized ATMs at the northwest corner of this intersection with cars pulling in and out of street parking spaces adding to traffic congestion. Turn signals and timing need to be improved at this location.

Response:

The comment states that the intersection of Sepulveda Boulevard & Westchester Parkway is the first entrance to LAX Northside for northbound traffic and that turn signals and timing at this intersection will need to be improved. As a point of clarification, northbound traffic on Sepulveda Boulevard can veer west onto Lincoln Boulevard and access Westchester Parkway – and thus the Project Site – via McConnell Avenue.

No specific mitigation is proposed for the intersection of Sepulveda Boulevard & Westchester Parkway, and it is identified as significantly and unavoidably impacted by Project traffic under both Existing with Project with Mitigation Conditions (year 2012) and Future with Project with Mitigation Conditions (year 2022). This location was reviewed for potential physical or operational improvements but no feasible mitigation was identified. Each of the four corners of the intersection is developed with existing structures, making physical widening of the street impossible without acquiring and demolishing or heavily modifying these structures. Further, changes to lane configuration through striping would require the removal of on-street parking along Westchester Parkway or Sepulveda Boulevard, parking which is essential to the successful operation of the existing commercial development along those streets.

However, the comment specifically requests improvements to turn signals and timing at this intersection. It is important to point out that the Los Angeles Department of Transportation (LADOT) has incorporated two important control systems into its signal system. The Automated Traffic Surveillance and Control (ATSAC) system allows remote monitoring and real-time traffic signal timing adjustment by LADOT engineers from a central command center. The Adaptive Traffic Control System (ATCS) is a computer-based traffic signal control program that automatically adjusts and optimizes traffic signal timing in response to current traffic and pedestrian demands to minimize delay. Both of these advanced systems have been implemented at City of Los Angeles intersections throughout the Study Area including at Sepulveda Boulevard and Westchester Parkway, and with their help the signal timing at this and other intersections is always optimized to best serve real-time conditions. Therefore, the request made in the comment is already incorporated into the intersection's signal controller.

LAXN-PC21-9
Comment:

The Lincoln Blvd egress/ingress to Westchester Parkway needs to be redesigned to allow smoother, safer, and faster transitions between the roadways.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. The comment suggests that the connections between Lincoln Boulevard and Westchester Parkway must be redesigned for better access. Westbound Lincoln Boulevard connects to Westchester Parkway by a pair of sweeping ramps to and from McConnell Avenue, and eastbound Lincoln Boulevard connects to Westchester Parkway by a pair of ramps to and from Northside Parkway. These ramps were designed for high-speed operation (Lincoln Boulevard has a speed limit of 50 miles per hour), and provide appropriate-length deceleration lanes for traffic leaving Lincoln Boulevard and acceleration/merge lanes for traffic joining Lincoln Boulevard. These ramps were designed specifically for this operation when Westchester Parkway was built in 1993, and are sufficient for the purposes of handling the increased traffic load from the Project. In fact, Westchester Parkway (and these connector ramps) were originally designed to accommodate as much as 4.5 million square feet of development with as many as 4,421 afternoon peak hour trips to and from the Project Site. The proposed Project would generate a total of 2,476 afternoon peak hour trips after the implementation of a transportation demand management program as part of the Project mitigation. Therefore, Westchester Parkway and these connector ramps will only need to serve approximately 56% of the traffic from the originally anticipated development.

LAXN-PC21-10
Comment:

The entrance/exit to/from La Tijera/Westchester Parkway will carry very heavy traffic to and from Sepulveda. Maintaining access to residential streets must be included. Noise buffers to shield residential areas from surface traffic should be included.

Response:

The comment requests that access to residential areas from surface streets must be maintained. The Project does not propose to close or vacate any public streets, and would not remove access to any residential streets.

The comment also requests noise buffers to shield residential areas from traffic noise. In fact, the Project is designed to shield the residents from both the Project and from the airport. As shown in Figure 04.1.3-5 on page 31 of the *LAX Northside Design Guidelines and Standards* (Rios Clementi Hale Studios, May 2014), there would be both an earthen berm and a soundwall between the Project and 88th Street to the north, shielding the residential neighborhood from La Tijera Boulevard and Westchester Parkway.

As noted in Section 4.10.2.6 Project Impacts related to noise, existing sound walls along the northern boundaries of Area 11 and Area 12A East will be maintained to shield residences from surface traffic. Additionally, as shown in Table 4.10-23 and Table 4.10-24 of the Draft EIR, proposed Project traffic noise levels would cause an increase in noise of approximately 1.0 dBA to 4.0 dBA in the AM and PM peak hours. These noise level increases are below the threshold of significance and therefore the proposed Project operational impacts related to traffic are less than significant.

LAXN-PC21-11
Comment:

The residential areas on Falmouth Ave and Loyola Blvd north of Westchester Parkway need to have protection from excessive LAX Northside traffic.

Response:

The comment requests protection of residential areas on Falmouth Avenue and Loyola Boulevard from Project traffic. However, based on a number of factors, such protection is not necessary. First of all, the Project is not expected to result in any significant traffic impacts on residential neighborhoods. Secondly, the traffic volume expected on Falmouth Avenue from Project traffic is low, as shown in Figure 7 of *Transportation Study for the LAX Northside Plan Update* (Gibson Transportation Consulting, Inc., May 2014), which is Appendix E of the Draft Environmental Impact Report. Falmouth Avenue is only projected to have a total of 12 southbound trips and 5 northbound trips during the morning peak hour and 19 southbound trips and 27 northbound trips during the afternoon peak hour, based on the Project-only trips at the intersection of Falmouth Avenue and Manchester Avenue. Loyola Boulevard north of Westchester Parkway does not directly serve residences. Third, Falmouth Avenue is classified as a secondary highway and Loyola Boulevard is classified as a collector by the City of Los Angeles. These streets are designed to carry far more traffic than a typical residential street ("local street" by City standards). Finally, the four analyzed intersections along Falmouth Avenue and Loyola Boulevard (#91, Falmouth Avenue & Manchester Avenue; #92, Falmouth Avenue & Westchester Parkway; #93, Lincoln Boulevard & Loyola Boulevard; #94, Loyola Boulevard & Westchester Parkway) are all projected to operate at LOS A or B during both the morning and afternoon peak hours under Future with Project with Mitigation Conditions (Year 2022), as shown in Table 4.14-15 on pages 4.14-114 through 4.14-121 of the Draft Environmental Impact Report. For all of these reasons, along with the fact that the residential streets between Falmouth Avenue and Loyola Boulevard all provide less direct routes into or out of the area than the major streets, the neighborhoods in that vicinity do not need protection from Project traffic.

LAXN-PC21-12
Comment:

Ongoing security must be provided for all residential areas abutting LAX Northside. Parking in the residential areas and cutting through them by foot to gain access to the project must be prohibited.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. LAWA does not have jurisdiction over security and parking located outside the Project site in adjacent residential areas, however the proposed Project is designed to minimize parking and cut through traffic by foot or vehicle.

As noted in Section 2.6.2 Community Compatibility, Urban Design Guidelines, and Sustainability of the Draft EIR, the proposed Project objectives include minimizing parking and traffic impacts on neighboring residential communities. The proposed Project meets this objective. The proposed Project includes Project Design Feature (PDF) Land Use (LU)-22, which requires parking spaces to conform to the standards set forth in the provisions of Los Angeles Municipal Code Section 12.21.A.4. Additionally, as noted in Section 4.14.3.1.7 Parking of the Draft EIR, the proposed Project's potential parking impacts were assessed by estimating the amount of parking required by LAMC for the proposed uses. During construction, an adequate number of parking spaces for construction workers would be available at all times on the Project site, and therefore no parking within neighborhoods is anticipated (Section 4.14.2.4.1 Construction of the Draft EIR). During operation, because the amount of parking for the commercial land uses will meet or exceed the LAMC requirements, and the recreational land uses will be using the ample parking of the office and research and development uses, the proposed Project will not have any significant parking impacts (Section 4.14.3.4.7 Parking of the Draft EIR).

Project Design Feature (PDF) Public Services-Police (PSP)-8 requires that proposed Project buffer areas adjacent to existing residences be secured by a 10-foot tall fence and not be publicly accessible. Additionally PDF Land Use (LU)-20 restricts direct access to and from the proposed Project from residential areas to the north of Area 2. Therefore, the suggestions that the proposed Project provide ongoing security and parking prohibitions in residential areas are not warranted.

LAXN-PC21-13
Comment:

Building permits should include instructions stating that all structures should be constructed to provide a sound buffer between the airport and the residences. Currently airport noise tends to travel along the La Tijera entrance/exit from Westchester Parkway directly into the residences north of 88th Street.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. As noted in Section 4.10.2.2.1 Noise of the Draft EIR, the dominant sources of noise in the vicinity of the Project site are aircraft activity and local roadways. Buildings on the Project site have minimal ability to buffer noise related to aircraft due to their relatively low heights. Additionally, as proposed Project buildings would be constructed within the Project site and not within the La Tijera right of way, they would be unlikely to buffer noise that currently travels along La Tijera towards residences north of 88th Street.

LAXN-PC21-14
Comment:

Building permits should also require that more parking spaces be required than the Los Angeles City code currently, and inadequately, requires. The City allows tandem parking and far too many compact spaces.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. The comment requests that the City require the Project to provide more parking spaces than the Municipal Code currently requires. The Project will comply with City parking requirements for all Project uses. To the extent feasible, shared parking may be used to reduce the overall number of parking spaces required (shared

parking is where two or more nearby land uses may provide reduced parking on a cumulative basis because each use's peak parking requirement occurs at different times of the day, such as an office building with a daytime peak sharing parking supply with a restaurant with a nighttime peak).

Each individual development as part of the Project will be required to comply with the City parking requirement at the time it is developed. Therefore, should City parking requirements increase prior to developing a Project Area, more parking would be provided than is currently anticipated. The use of tandem parking and compact parking spaces, within the guidelines of the City Municipal Code, will be at the discretion of the individual developers of each property or parcel to best meet the needs of the occupants.

LAXN-PC21-15
Comment:

Strict requirements and enforcements must be included in all construction permits that adequately address the problem of fugitive dust and particulate matter spreading into residential areas and across the airfield from construction sites. (Currently in Area 11 there are mounds of dirt which are not covered, are higher than the surrounding fence, and the material attached to the fence to prohibit dust and particulate matter from escaping is flapping uselessly in the wind rather than acting as a barrier.)

Response:

The comment addresses a general subject area (i.e., construction fugitive dust), which received extensive analysis in the Draft Environmental Impact Report ("EIR") in Section 4.2, Air Quality. The comment raises a concern about the fugitive dust and particulate matter from construction on the airfield and within "Area 11". While the current construction occurring within the airfield and current activity on "Area 11" resides on the site of the LAX Northside Project, the current activity in these areas is not part of the LAX Northside Project. Nevertheless, the Project upon buildout will improve the current situation by eliminating the use of "Area 11" as a construction laydown location, thereby removing any excess dirt currently located on Area 11. Furthermore, the LAX Northside Project will incorporate dust control measures (LAX Master Plan EIR/EIS Commitments MM-AQ 2 on Draft EIR p. 4.2-31) consistent with the SCAQMD requirements to minimize the potential for fugitive dust emissions during construction of the Project. The project will also comply with the dust control requirements of SCAQMD Rule 403, which are discussed in Section 4.2.3.1.1 (page 4.2-18) of the Draft EIR.

LAXN-PC21-16
Comment:

Ongoing security must be provided for all residential areas abutting LAX Northside. Parking in the residential areas and cutting through yards by foot to gain access to the project must be prohibited.

Response:

See response to comment LAXN-PC21-12.

LAXN-PC21-17
Comment:

Security, maintenance, and upkeep of the open spaces should be a permanent LAWA responsibility.

Response:

As noted in Section 4.12.2.2.2 Existing Conditions relating to police service of the Draft EIR, safety and security services at the Project site and Project site vicinity are currently provided by LAWAPD and LAPD, LAX Division. The proposed Project would not change the roles and responsibilities of LAWA, LAWAPD, or the LAPD. Safety and security services would therefore continue to be provided by LAWAPD and LAPD, not LAWA.

Additionally, as the LAX Northside properties are leased or sold, ongoing maintenance

would become the responsibility of the future property owners or lessees.

LAXN-PC21-18
Comment:

Having the area between Falmouth and Pershing remain as open space with recreational uses is crucial for the community. If the water agency cannot or will not pay to use the area underground at this location as a water storage area, other ways to maintain it as open space need to be investigated. Or there needs to be an agreement with the FAA that it can remain as open space.

Response:

As noted in Section 4.9.3.3.3 Project Design Features of the Draft EIR new recreational space can only be developed in conjunction with other commercial uses that achieve fair market value at the Project site. These requirements are consistent with FAA requirements to achieve fair market value, which prevent LAWA from allowing development of open space without corresponding development that achieves fair market value. On August 25, 2014 LAWA signed a Letter of Intent with the City of Los Angeles Bureau of Sanitation to jointly develop facilities at the Project site designed to minimize the discharge of pollutants to Santa Monica Bay through stormwater runoff. On November 6, 2014 the LAWA Board of Airport Commissioners authorized the Executive Director to execute a Memorandum of Understanding between the City of Los Angeles Department of Public Works, Bureau of Sanitation and the City of Los Angeles Department of Airports for the preparation of design and environmental documents for the proposed Argo Drain Sub-basin and the Hyperion connection which includes a new high-flow diversion structure to divert LAWA's stormwater runoff in the Imperial/Pershing Sub-basin to the Hyperion Treatment Plant. The City of Los Angeles Board of Public Works authorized the Director of Bureau of Sanitation to execute the Memorandum of Understanding on November 19, 2014. The Argo Drain Sub-basin Facility would be located generally underground and could potentially allow open space uses to be developed on the surface at the Project site. The proposed Project sets the regulatory framework that would allow these uses to be developed. Any such project would be subject to further review and approval under the CEQA.

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. LAWA continues to coordinate with LABOS and the FAA to enable development of Area 1 with a stormwater treatment facility and open space that complies with FAA requirements regarding revenue diversion. The proposed Project sets the regulatory framework that would allow these uses to be developed, should an agreement be reached.

No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-PC21-19
Comment:

Although the overall density of this project is much reduced from the EIR approved in the 1980s, the projected traffic this development would cause and the impact it would have on the surrounding communities and on LAX require that further density limitations must be studied.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. Section 6.0 of the Draft EIR evaluates project alternatives, including Alternative 3 the Reduced Density Alternative.

Alternative 3 represents a development only two thirds the size of the proposed Project,

consisting of up to 1,546,667 square feet of a similar mixture of land uses as the Project. As described in Section 6.9.2.14 on pages 6-69 and 6-70, Alternative 3 would result in significant traffic impacts, before mitigation, to six intersections in either the morning or afternoon peak hours under Existing with Project Conditions (year 2012) and eleven intersections under Future with Project Conditions (year 2022). With the implementation of the proposed traffic mitigation program, Alternative 3 would result in one significant impact under both Existing with Project with Mitigation Conditions (year 2012) and Future with Project with Mitigation Conditions (year 2022), at Intersection #33, Sepulveda Boulevard & I-105 Westbound Ramps. This Alternative resulted in a reduction of 2 significant traffic impacts under Existing with Project with Mitigation Conditions (year 2012) and 3 significant impacts under Future with Project with Mitigation Conditions (year 2022) as compared to the Project analysis. However, as described in Section 6.9.3 on pages 6-76 and 6-77, Alternative 3 would be limited in overall square footage, would reduce but not eliminate all significant transportation impacts, and would not achieve the economic objectives of the Project.

Table 6-23 of the Draft EIR is incorrect in the title of Alternative 3 and Alternative 4. Alternative 3 is the Reduced Density Alternative, while Alternative 4 is the Reduced Retail Alternative. This correction does not change the analysis or conclusions of the Draft EIR. Please see Chapter 3.0 of the Final EIR for Corrections and Additions to the Draft EIR.

LAXN-PC22 **Dr. Cynthia Colon Hoepner** **St. Bernard High School** **7/21/2014**

LAXN-PC22-1

Comment:

I am writing on behalf of St. Bernard High School (SBHS), in support of a plan that would benefit the entire surrounding community. The Northside Plan as it stands would enrich and contribute to the Westchester/Playa del Rey neighborhood. It is our hope that an approved plan would open up more space both for our own students and for community members to use on the weekends and after school hours. The Northside Plan includes recreation space on the land immediately adjacent to SBHS. Our plan is to partner with LAWA and take responsibility for developing that recreational space.

The plan we support would include: a football field with a regulation-sized track, a soccer field, a softball field, expansion of the current baseball field (with the closing of Cum Laude Road), a children's play area, a small dog park, and a concession area to serve all users of the larger facility.

This proposed plan would be a win-win: more field space for the school, and a shared-use of the fields and space for families in the neighborhood. The same model exists in surrounding communities: Mira Costa HS, for example, shares its renovated track and fields with organizations including AYSO, BCS football, lacrosse leagues, and individual members of the community who can be found walking and running on the track during after school and weekend hours.

We urge you to consider a plan that would benefit many.

Response:

This comment regarding support for the proposed Project is noted for the record and will be forwarded to the decision-makers for review and consideration.

LAXN-PC23 **Eion Faelten** **None Provided** **7/21/2014**

LAXN-PC23-1
Comment:

My name is Eion Faelten and I am a homeowner in Playa del Rey. I am adamantly

opposed to the proposed soccer field on the property adjacent to Falmouth and Manitoba otherwise designated Area 1. My objections are for a variety of reasons as follows.

Response:

This comment regarding opposition to one allowable use in the proposed Project's Open Space and Recreation land use category is noted for the record and will be forwarded to the decision-makers for review and consideration. See responses to PC17-3 and PC20-1.

No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-PC23-2
Comment:

1) Excessive noise, pollution and unneeded congestion associated with such events.

Response:

Table 4.10-12 and Table 4.10-13 of the Draft EIR disclose the Construction Phase Maximum Noise Level (dBA) and Change in Hourly Noise level During Construction Activities (dBA) at representative sensitive receptor locations located in close proximity to the Project site. As shown, construction activities do not contribute to noise in excess of ambient levels in Area 2 where open space and recreation uses, which could include soccer fields, would be allowed.

As discussed in Section 4.10.2.6.2 Operations of the Draft EIR, the proposed Project would include a 20-foot buffer and 80-foot setback in Area 1 and a 100-foot buffer and 20-foot setback in Area 2 where new open space and recreation uses are allowed. These buffers and setbacks would separate noise generating uses from sensitive receptors. The existing ambient noise levels in these areas ranges from 65 CNEL to 70 CNEL due to aircraft noise exposure and measured existing ambient noise levels range from 59.7 L_{eq} dBA to 70.7 L_{eq} dBA. Introducing a soccer field to this area with presumed ambient noise ranging from 55 dBA L_{eq} to 60 dBA L_{eq} would not cause ambient noise to increase such that noise significance thresholds would be exceeded.

Table 11 in Appendix C of the Draft EIR provides the criteria air pollutant emissions associated with operational activities of the Project's open space and recreation area. These activities contribute less than two percent of the total operational emissions associated with the Project (Draft EIR Table 4.2-9, p. 4.2-38).

The comment is concerned with congestion related to the use of the proposed soccer fields as part of the Project. Typically, soccer fields are considered a community benefit promoting health, exercise, and family recreation. Further, compared to most of the various land uses that could have been proposed for the site, soccer fields generate very few trips, especially during the peak commuter hours when general traffic levels are highest. Rather, soccer fields generate the most traffic on weekday evenings (typically later than the peak commuter hours) and weekend days. Congestion would typically only result when high volumes of parents are dropping off or picking up a child for practice or a game or when inadequate parking is provided and people circle the block looking for available street parking. Response to Comment LAXN-PC20-3 describes in detail how parking for the recreational uses, including the soccer fields, would be provided by the proposed adjacent office and research and development uses through a shared parking agreement, since the soccer fields are used well outside the peak hours of office parking demand. Therefore, parking availability will not be a factor in any congestion related to the use of the soccer fields. Any congestion related to pick-up and drop-off would be for very brief periods, and through the design and layout of the fields could be focused on Falmouth Avenue and Cum Laude Avenue, adjacent to St. Bernard's High School.

LAXN-PC23-3
Comment:

2) Playa del Rey is already under attack by a surge of vandalism, auto break ins, and burglaries associated with the typical undesirable elements such a facility has been known to attract.(I only need reference the chaos that occurs on the 4th of July as gangbangers and other neer-do wells traipse through our neighborhood).

Response:

This comment regarding existing conditions unrelated to the proposed Project is noted for the record and will be forwarded to the decision-makers for review and consideration.

LAXN-PC23-4
Comment:

3) It is a known fact that most of the people using such a facility will be imported from other areas and won't add anything positive to our neighborhood so I ask why should my tax dollars go to support this?

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-PC23-5
Comment:

4) I think it is safe to say that the proponents of this come from out of PDR and are exercising the well known NIMBY principle.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. It is further noted that support for the proposed Project has been expressed by commenters within the community, as shown in LAXN-AL02, LAXN-AL03, and LAXN-PC22.

No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-PC23-6
Comment:

5) In short such a facility should be located where the main participants are located and not imposed on our neighborhood which may be politically incorrect but needs to be said.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. It is further noticed that a series of design charrettes, open houses, and community leaders meetings were held in 2012 and 2013 to define the uses allowed in each area within the Project site in collaboration with community stakeholders. Support for inclusion of open space and recreational facilities, which could include soccer fields, was expressed during outreach conducted for the proposed Project.

No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-PC23-7
Comment:

So in closing I suggest you rethink locating your facility on us because we can very well live without it and don't want it.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

No further response is required because the comment does not raise any new environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-PC24 **Garrett Smith** **None Provided** **7/21/2014**

LAXN-PC24-1
Comment:

Please consider my comments regarding the Northside Development . My immediate primary concerns regard construction noise, hours of construction, off-site parking for both development and construction. Through traffic on Emerson Avenue and transportation. Please reference the list below.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. Responses to primary concerns regarding construction noise, hours of construction, off-site parking, and traffic are addressed in responses to comments LAXN-PC24-2 through LAXN-PC24-15 below.

LAXN-PC24-2
Comment:

1. All construction noise, operations and material handling be done durning [sic] normal hours as specified by the city of Los Angeles. Monday through Friday 7:00 a.m. to 9 p.m. Saturdays 8:00 a.m. To 6:00 p.m. Sundays no construction. Per 41.40. LAMC

Response:

As noted in Section 4.10.2.6.1 Construction related to noise of the Draft EIR, the proposed Project would comply with Los Angeles Municipal Code Section 41.40. Additionally, as noted in Section 4.10.2.5.1 LAX Master Plan EIS/EIR Commitments of the Draft EIR, the proposed Project would comply with LAX Master Plan mitigation measure MM-N-10: Construction Scheduling. This mitigation measure requires the timing and/or sequence of the noisiest on-site construction activities to avoid sensitive times of day, as feasible (9 p.m. to 7 a.m. Monday – Friday, 8 p.m. to 6 a.m. Saturday, and anytime on Sunday or Holidays).

LAXN-PC24-3
Comment:

2. Vehicle loading or unloading times, same as construction hours.

Response:

The comment requests that vehicle loading and unloading be during the same hours of the day that the City of Los Angeles allows construction (that is, 7:00 a.m. to 9:00 p.m. on weekdays and 8:00 a.m. to 6:00 p.m. on Saturdays only). However, restrictions on the times that vehicle loading and unloading occur are unnecessary for this Project. First of all, the Project access points will not be on residential streets, and delivery trucks will not travel on residential streets to reach the Project Site. Secondly, the Project would be designed to provide a buffer – through landscaping, earthen berms, and soundwalls depending on the location – between the Project Site and the adjacent residential neighborhoods to the north. Thirdly, commercial deliveries are scheduled so as not to

interfere with normal operations of the development. For retail or restaurant uses, this typically means that deliveries occur during the night or early morning hours. For office buildings, deliveries typically arrive during business hours because they are received by tenants working normal business hours. Standard deliveries resulting in loading or unloading at the Project Site – no matter what hours they occur – are not anticipated to result in any negative effects on the residential neighborhood.

LAXN-PC24-4
Comment:

3. All related parking be on site.

Response:

As described in Section 4.14.2.4.7 on page 4.14-90 and 4.14-91 of the Draft Environmental Impact Report, the Project would provide parking for each land use developed on the Project Site in accordance with Los Angeles Municipal Code parking requirements at the time of approval of each individual development. The parking provided will at all times meet or exceed the City parking requirement.

LAXN-PC24-5
Comment:

4. No through access on Emerson Street except for emergency vehicles (LAFD) that currently use it now.

Response:

The comment requests that Emerson Street remain closed to through traffic with implementation of the Project. Emerson Street is proposed to remain closed, as in the current condition and in accord with the comment's request, as part of the Project.

LAXN-PC24-6
Comment:

5. Permit or restricted parking be offered to residences between McConnell and Sepulveda Westway and Manchester on the north on a block by block (as approved by residents) basis paid for by The Northside Development perpetually. LAWA will pay for any study necessary to obtain preferential parking permits.

Response:

The comment requests that the Project pay in perpetuity for residential parking permits in the neighborhoods north of the Project Site. The Project is not anticipated to have any neighborhood traffic impacts, nor any parking impacts since parking will be provided at a level to meet or exceed the applicable Los Angeles Municipal Code requirements at the time each building is developed. No physical connections between the neighborhood and the Project sites will be provided and therefore parking in the neighborhood will not be desirable for Project employees or visitors. Therefore, it is unlikely that Project traffic would park on the residential streets north of the Project Site. Given the less than significant Project impact, the suggestions requested by the commenter are not necessary or warranted.

LAXN-PC24-7
Comment:

6. A transportation center should be integrated into the development to include connections to the Metro 115 route, the Big Blue bus route 3 and the Greenline as well as the new ITF Intermodal Transportation Facility. Connections to the bus lines should be direct and not just nearby as stated in the draft EIR.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. The Project's traffic mitigation program includes a transportation demand management (TDM) program, which would have a number of features designed to encourage alternative modes to single-occupant vehicles. One of the features would be the implementation of a transportation information center, which is

a centrally located commuter information center where the Project employers and employees can obtain information regarding commute programs and real-time information for planning travel without using an automobile. Also, the mitigation program includes provision of two new buses to add frequency to the peak hour service of Metro Line 115 running east and west on Manchester Avenue. Further, the Project would set aside space – to be identified in conversations with Metro and the Los Angeles Department of Transportation (LADOT) – for a future transit station to serve buses, a potential new light rail train, or other modes. As this space is chosen and eventually developed, it will be integrated as fully as possible into the transit system that exists at that time, including all reasonable attempts to connect Big Blue Bus Route 3, the Metro Green Line light rail, and the Intermodal Transportation Facility.

During development of the Project's traffic impact analysis and mitigation program, a circulator shuttle around the Westchester neighborhood was explored. However, the shuttle concept was rejected as Project mitigation because the shuttle did not result in additional reduction of significant impacts from the three impacts identified under Existing with Project with Mitigation Conditions (year 2012) and the four impacts identified under Future with Project with Mitigation Conditions (year 2022). The Federal Aviation Administration, which put up the funds to buy the land the Project sits on decades ago, has ultimate say in what is acceptable mitigation for the Project, and would not support paying for mitigation measures that have no direct nexus to reducing Project impacts. Therefore, implementation of a circulator shuttle in the Westchester neighborhood was not a feasible or effective mitigation for the Project.

LAXN-PC24-8
Comment:

7. The additional bus being provided to Metro Route 115 should be CNG or electric. The bus provided must run the entire length of Route 115 from Playa Del Rey to the Norwalk station, this is called the long or extended route.

Response:

The comment requests that the new buses provided for Metro Route 115 should be powered by natural gas or electricity and should operate along the extended route that includes Westchester and Playa Del Rey. The buses will be funded by the Project, but purchased, operated, and maintained by Metro according to their standards and preferences. The Project does not have the power to dictate to Metro the type of fuel system on the buses. However, the buses will travel on the extended route, as requested by the comment.

LAXN-PC24-9
Comment:

8. The Northside Development should also provide an additional north-south bus for the Big Blue line which is Route 3. It should also be CNG or electric.

Response:

The comment requests that the Project also provide a bus for Santa Monica Big Blue Bus (BBB) Route 3, running north and south on Lincoln Boulevard, Manchester Avenue, and Sepulveda Boulevard through the Study Area, and that such bus be powered by natural gas or electricity. During development of the Project's traffic impact analysis and mitigation program, a bus for BBB Route 3 was considered. However, similar to the idea to install a circulator shuttle in the Westchester Neighborhood described in Response to Comment LAXN-PC24-7, this bus was determined not to result in additional reduction of significant impacts from the three impacts identified under Existing with Project with Mitigation Conditions (year 2012) and the four impacts identified under Future with Project with Mitigation Conditions (year 2022). The Federal Aviation Administration, which supplied the funds to buy the land the Project sits on decades ago, has ultimate say in what is acceptable mitigation for the Project, and would not support paying for mitigation measures that have no direct nexus to Project impacts. Therefore, purchase of a bus for

BBB Route 3 was not a feasible or effective mitigation for the Project.

LAXN-PC24-10
Comment:

9. A factual traffic study should be done for Culver Boulevard, Vista Del Mar and Nicholson in Playa Del Rey. The traffic study in the draft a [sic] EIR does not reflect the actual traffic conditions for that area.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. Response to Comment LAXN-AL06-2 addresses a substantially similar comment in depth. Please refer to Response to Comment LAXN-AL06-2.

LAXN-PC24-11
Comment:

10. If Lawa Police relocates their headquarters to area 12, the square footage of their building should be included in the 2,300,000 ft. of the total project. Since every trip to and from the headquarters will be a new trip, this should be reflected in the new traffic study in the Final EIR.

Response:

As noted in Table 2-3 Land Uses, Heights, and Square Footages Permitted Under the Proposed Project of the Draft EIR, the proposed Project would accommodate a Community or Civic Use such as LAWAPD to be located in Area 12A East or Area 12AWest. In no case would the proposed Project uses exceed a cumulative total of 2,320,000 net new square feet.

The comment requests that the square footage that would be allotted to the LAWA police department, should it move its headquarters into Area 12, be added to the total Project square footage and re-analyzed. However, the potential space for the police headquarters is already considered in the land use proposal for Area 12. As shown in Table 2-3 on page 2-15 of the Draft Environmental Impact Report, Areas 11, 12A East, and 12A West are anticipated to have as much as 600,000 square feet combined of community and civic uses. The traffic study, found in Appendix E to the Draft Environmental Impact Report, anticipates up to 200,000 square feet of office and 130,000 square feet of community and civic uses between Areas 12A East and Area 12A West. Should the police headquarters move to this area, it would not be additional square footage to the Project, as any square footage allocated to the headquarters would reduce the remaining available allocation on that Project Area. In fact, not only are the trips that would occur as a result of the police headquarters already accounted for in the traffic study, but the traffic study is more conservative in that it assumes that Project trips would all be new to the area. Since the police headquarters is currently located on LAWA property, its trips are already traveling to and from the area today, and would simply change final destinations to the LAX Northside property.

LAXN-PC24-12
Comment:

11. In areas 4 through 9 designated for airfield support, direct access to the air field should be used instead of Falmouth Avenue as much as possible. The hours of operations that vehicles exiting on Falmouth Ave. should be the same as the construction hours. Turn restrictions should be put on all vehicles exiting that location, right and left turn only, no through traffic.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

It is not feasible to restrict airfield support uses from traveling outside of the airfield, as not

all areas that they service can easily be reached internally from the north edge of the airport property. Specific access planning and potential restrictions will be developed and reviewed by the City for each separate development application as part of the Project. It is intended that the Falmouth Avenue driveway to Westchester Parkway would only provide left and right turns, prohibiting through traffic across Falmouth Avenue. That driveway was analyzed as Intersection #92 in the Draft EIR. As shown in Tables 4.14-9 for Existing with Project conditions (year 2012) and 4.14-11 for Future with Project conditions (year 2022), that intersection is projected to operate at LOS A during both the morning and afternoon peak hour after the addition of Project traffic. It would not be significantly impacted by Project traffic, and there is no requirement that access to airport support facilities to the south be restricted from using that driveway.

LAXN-PC24-13
Comment:

12. Playa Vista as a major development should be included as a related project.

Response:

As described in detail in Response to Comment LAXN-AL07-8, the Project's traffic study took into account both known related projects and long-term future developments that were included in the LAX Traffic Model, which was used to forecast Future without Project (year 2022) conditions. The related projects list, included as Table 9 of the traffic study (*Transportation Study for the LAX Northside Plan Update,* Gibson Transportation Consulting, Inc., May 2014, provided as Appendix E to the Draft Environmental Impact Report), will be updated to reflect the related project noted in the comment. The addition of Playa Vista as a related project does not change any conclusions in the Draft EIR.

See response to LAXN-AL06-6. Playa Vista was already included in the traffic study in the Draft EIR and is now specifically listed as a related project. Please see Chapter 3.0 of the Final EIR for Corrections and Additions to the Draft EIR.

LAXN-PC24-14
Comment:

13. The Northside Development should not receive any transit credits for lines that do not directly connect to the project.

Response:

There are a few different ways that the Project receives transit credit. The first way is as a credit off of the trip generation estimates shown in Table 4.14-8 on pages 4.14-47 and 4.14-48 of the Draft Environmental Impact Report (5% transit credit on office, research and development, and community/civic uses which are expected to consist primarily of employee commute trips during the peak hours). The second way is as one of a number of components of the Project's transportation demand management (TDM) program, which was allowed an additional 5% reduction in peak hour trip generation for office, research and development, and community/civic uses. The third way is via the provision of two additional buses for Metro Route 115 to add frequency to the existing transit route on Manchester Avenue.

Pursuant to direction from the City of Los Angeles traffic expert (LADOT), the first two applications of transit credit are justifiable because it is within walking distance of Metro Route 115 on Manchester Avenue, Santa Monica Big Blue Bus (BBB) Route 3 on Manchester Avenue and Sepulveda Boulevard, BBB Rapid 3 on Lincoln Boulevard, and Culver City Bus Route 6 on Sepulveda Boulevard. Additionally, there are features of the Project's TDM program that can help people travel between transit options and the Project Site, including bicycle share programs, bicycle racks and lockers, and carsharing programs. For these reasons, use of public transit to travel to and from the Project Site is still a viable alternative to driving and consistent with industry standard practices.

The third application of transit credit, the provision of additional buses for Metro Route

115, is designed to mitigate specific intersection impacts along Manchester Avenue. These buses will be used to increase the frequency of operation of Metro Route 115 during the morning and afternoon peak periods, and therefore increase the likelihood that people will ride that bus route rather than drive. The benefit of this improvement to the roadway system does not depend on Project employees to be the sole benefactors – anyone who lives or works along Metro Route 115 would benefit from the increase in frequency, and automobile traffic along the whole route would experience a reduction due to additional transit riders. Therefore, while some of the additional riders on Metro Route 115 will likely be Project employees, the benefit of the improvement applies to everyone and is realized by all types of riders.

LAXN-PC24-15

Comment:

In general I find the LAX Northside Development to be a project that the community can support if the impacts of this project can be kept to a minimum. A big plus would have Otis graduate studies across the street from their current location. The additional park space and dog park is a must. I love that landscaping and lighting in the draft EIR, very nice.

Response:

This comment in general support of the proposed Project is noted for the record and will be forwarded to the decision-makers for review and consideration.

LAXN-PC25 **Kent Strumpell** **None Provided** **7/21/2014**

LAXN-PC25-1
Comment:

While the LAX Northside plan (the Plan) as described in its DEIR has many encouraging elements, such as a reduction in size compared to previous plans, careful buffering of residential areas, and community serving features, it is still primarily a suburban office-retail development with access heavily dependent on motor vehicles and their attendant energy consumption and greenhouse gas emissions. This is disappointing given that new development of this scale has a special opportunity and responsibility to incorporate designs that can better prepare us for a future where resources will be more scarce and imperatives to avert the catastrophic dimensions of climate change will become ever-more-essential. With this in mind, the following comments are intended to encourage changes that will make the project more sustainable in these regards.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. Responses to specific comments are addressed in responses to comments LAXN-PC25-2 through LAXN-PC25-7, below.

LAXN-PC25-2
Comment:

1. The project does not have convenient and pervasive access to public transit
The project is essentially isolated from regular, convenient public transit service. A better transit access plan could greatly improve the proposed project's ability to meet greenhouse gas mitigation goals. LImited [sic] transit access planning for the project is frustrating because of the availability of numerous existing transit lines in the vicinity but just out of reach. The nearest bus lines are on Sepulveda and Manchester Boulevards and many parts of the project will be so far from existing transit stops that walking to them will simply not be feasible for most people. This is further compounded by the intention to prevent bicycle-pedestrian linkages to the north, which, if allowed, could provide easier access to bus stops on Manchester.

The proposal to fund the purchase and operation of two additional buses for Metro bus line 115 is admirable but does not solve the basic "first mile-last mile" problem. It is also

admirable (but should really be an obvious requirement) that the Plan includes locating an LRT station somewhere near it's eastern edge, if and when such a line is funded and built. But again, this will be of limited value if those who would like to use it cannot get to the LRT station conveniently at all hours. Plus, an LRT line that would be served by an on-site station is far from certain, with no funding or plans in place.

Recommendations for 1.
Therefore, the project should assure that employees, patrons and visitors arriving at nearby transit stops have regular, convenient access to the project's varied locations throughout day and evening hours (note that employees of the "creative" workplaces envisioned often work well beyond normal business hours). Such transit access may come in the form of a regular, all-hours shuttle or a new Dash bus route on Westchester Parkway connecting to nearby intermodal transit facilities. In fact, the project's linear form, with all parcels within close proximity of Westchester Parkway, lends itself to a simple service route.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. As discussed in detail in Response to Comment LAXN-PC24-7, a circulator shuttle was considered during the preparation of the Project's traffic study and mitigation program, but was ultimately rejected because of the fact that it would not result in additional reduction of significant impacts over what the remainder of the mitigation program already provided. With or without the circulator shuttle, the Project would have the same significant impact to intersections, after mitigation. The Project would not have a significant impact on transit capacity or access. The Federal Aviation Administration would not support paying for mitigation measures that have no direct nexus to reducing significant Project impacts. Therefore, implementation of a circulator shuttle in the Westchester neighborhood was not a feasible or effective mitigation for the Project, and it is not necessary for the Project to provide that service.

LAXN-PC25-3
Comment:

2. Bicycle improvements planned will not meet the needs of cyclists of diverse abilities and are inconsistent with the goals of the City of Los Angeles Bicycle Plan

The existing bike lanes on Westchester Parkway, next to high-speed traffic, are not perceived as a safe and comfortable bike route for many people, creating a significant barrier to bicycle use. Because the project is still in the conceptual design phase, this is an ideal opportunity to incorporate more inclusive cycling options to address the needs of a broad cross-section of potential bicycle riders, an objective of the City of Los Angeles *2010 Bicycle Plan*.

Recommendations for 2.
One solution would be to widen, pave and stripe all or part of the planned gravel trail in the Paseo to accommodate cycling by those who do not feel safe using the on-road lanes. Crossings at Falmouth, Loyola, etc. should also include features to provide safety to both cyclists and pedestrians at those roads. This improvement would provide a multi-use trail that less-confident cyclists could use while the existing bike lanes on Westchester Parkway would accommodate faster riders. This would also provide accommodation for strollers, wheel chairs, skaters and push scooters, all of which are activities that would be compromised if the path was made only of a gravel material. The EIR should also consider if the proposed gravel path would meet ADA requirements. Observations of existing paths, such as on Culver Blvd., demonstrate that the majority of pedestrians choose to walk on the paved bike path there rather than the decomposed granite trail.

Another strategy the Plan needs to include is to provide bikeway improvements that will

enhance bicycle connectivity to the surrounding community. Pershing, Falmouth, Loyola, Lincoln, La Tijera and Sepulveda are all streets that could provide bicycle access. The plan should describe how intersections, entry points and driveways will provide safe and convenient bikeway linkages to the project.

Finally, the project planners and consultants should contact and work with City of Los Angeles Bikeway Program personnel within LADOT and DCP to assure that the proposed LAX Northside plan is taking full advantage of bicycle transportation opportunities and is consistent with prevailing plans and regulations. Please contact Michelle Mowerey at LADOT (213-972-4962 Michelle.Mowery@lacity.org) and David Somers (david.somers@lacity.org) at DCP.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. It is important to note that the Draft EIR does not identify any significant impact with respect to the *2010 Bicycle Plan*, and therefore there is no nexus to requiring Project mitigation or improvement for the *2010 Bicycle Plan*.

The Paseo is intended to be an off-street pathway for all forms of non-motorized access. It would consist of the existing 10-foot sidewalk on the north side of Westchester Parkway and an additional 12-foot pathway paved with decomposed granite. Additionally, Westchester Parkway has – and would continue to have – on-street bicycle lanes. Therefore, bicyclists with the skill to ride in the on-street bicycle lanes next to traffic would have the ability to travel in that high-speed corridor. Those that prefer a more comfortable and leisurely ride could remain on the decomposed granite Paseo. Wheelchairs, strollers, skaters, and scooters could ride on the sidewalk or on the pathway as preferred by each individual. The sidewalk would meet Americans with Disabilities Act (ADA) guidelines.

There are existing bicycle lanes on Westchester Parkway, Pershing Drive south of Westchester Parkway, and Manchester Avenue between Lincoln Boulevard and La Tijera Boulevard. According to the *2010 Bicycle Plan*, (Los Angeles Department of City Planning, March 2011), bicycle lanes are eventually proposed pursuant to the City of Los Angeles Bicycle Plan for the remainder of Pershing Drive and Manchester Avenue, Lincoln Boulevard, La Tijera Boulevard, and Sepulveda Boulevard, and Loyola Boulevard and Emerson Avenue are slated to become Bicycle Friendly Streets. Most if not all of the bicycle lanes proposed in this area pursuant to the City of Los Angeles Bicycle Plan will require the removal of on-street parking or the removal of a vehicular travel lane in order to provide sufficient physical space for the bicycle lane. While these lanes would provide benefits to the people who would take advantage of additional bicycle connectivity in the area, the reduction in either on-street parking capacity or vehicular travel capacity would result in transportation changes that would have to be weighed by City Council at the time of bicycle lane implementation.

The Project supports bicycle connectivity within the area, including the implementation of the *2010 Bicycle Plan* by the City. However, any such implementation is beyond the scope of the proposed Project and is not warranted by proposed Project impacts.

LAXN-PC25-4
Comment:

3. The Plan does not provide for sufficient bicycle connectivity to nearby transit lines

As noted above, existing and proposed public transit improvements intended to serve the project are located too far from the majority of the project area to be a viable option for most people. Bicycles can be an excellent feeder to transit lines but only if patrons feel comfortable cycling between transit stops and their destinations. Such enhanced access is a goal of Metro's Bicycle Strategic Plan.

Recommendations for 3.
Features should include:
- As noted above, a multi-modal, off-road trail within the planned Paseo, suitable for cyclists who would not ride on Westchester Parkway.
- Preservation of bike lanes on Westchester Parkway and Pershing Dr.
- Secure long and short-term bicycle parking at primary transit stops and within the Project.
- Showers, lockers and secure bike storage in new buildings per City building codes.
- Promotion of bicycle commuting as a required element of a more ambitious TDM plan (see 5, below).
- Contact Metro bike program staff for best practices and resources on bicycle and pedestrian access plans in station areas. (Tony Jusay, 213 922 3446, JUSAYA@metro.net)

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration Response to Comment LAXN-PC25-3 provides a detailed response to the suggestion to modify the Paseo concept. Existing bicycle lanes on Westchester Parkway and Pershing Drive would be retained with implementation of the Project. The Project does not propose any changes to existing bicycle lanes.

The Project would provide bicycle amenities, including long- and short-term parking, at levels that meet or exceed City requirements. As bicycle promotion is a key component of the proposed transportation demand management (TDM) program, and the *LAX Northside Plan Design Guidelines and Standards* (Rios Clementi Hale Studios, May 2014) require that bicycle parking be appropriately placed to access the various developments of the Project. It is not necessary or feasible to provide bicycle parking at local transit stops, both because sufficient space within public right-of-way adjacent to transit stops is not available and because it is highly unlikely that commuters on public transit would be willing to leave their commuter bicycles stored on a public street overnight and over the weekends. Aside from that, most transit operators provide bicycle racks on the front of their buses, and these serve transit riders who wish to use their bicycle for “first-mile and last-mile” travel. As discussed above, the Project would provide bicycle amenities at levels that meet or exceed City requirements.

The TDM program will have a robust bicycle promotion arm, as described on page 155 of *Transportation Study for the LAX Northside Plan Update* (Gibson Transportation Consulting, May 2014), which is provided as Appendix E to the Draft Environmental Impact Report. It notes that the Project would incorporate features for bicyclists such as exclusive access points, secured bicycle parking facilities or a bicycle valet system, a bicycle sharing or rental program, and showers.

LAXN-PC25-5
Comment:

4. The project lacks non-motorized access to Manchester Blvd. and the surrounding residential areas between Lincoln Blvd. and Falmouth Ave.

Residents who live immediately next to the proposed project have expressed their desire that all automobile, pedestrian and bicycle access between the project and adjacent residential streets be prevented. Of course car traffic should not be allowed to burden neighborhood streets, but the benefits of bicycle and pedestrian connectivity far outweigh the remote possibility of the problems anticipated. These benefits include:
- Allowing easier access for the whole community to the many community-serving amenities proposed, including healthful physical activities.
- Reducing the need to drive to the project and reducing the need for parking there.
- Enhancing access between the project and transit lines on Manchester Avenue.
- Possible emergency access routes between the project and locations to the north.

The ability to get around locally without needing to drive is a benefit that will only become more important over time as the need for healthful activity, resource conservation and greenhouse gas reductions become more urgent.

Recommendations for 4.
Therefore, the Plan should include and preserve bike and pedestrian connections to the surrounding community at Stanmoor Dr. and Rayford Dr., even if these are not immediately opened due to some neighbors' opposition at the present time.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. The comment suggests that the benefits of allowing bicycle and pedestrian access between the Project Site and the neighborhoods to the north far outweigh the potential concerns of the residents. While pedestrian and bicycle connections could benefit the neighborhood, it was clear based on several meetings with the residents living north of the Project Site that there is a strong desire among the neighbors to block all access (vehicular, bicycle, and pedestrian) between the Project Site and the neighborhood streets. LAWA has honored the neighbors' wishes to disallow this access in the design of the preliminary site plans for the Project. However, this comment will be forwarded to the decision-makers who have ultimate authority to determine whether any connections should be made for pedestrians or bicyclists to the neighborhoods to the north. It is important to note that the Project as proposed would not cause a significant impact on neighborhood streets or on bicycle facilities.

LAXN-PC25-6
Comment:

5. The project needs to require stronger TDM programs for employees who will work there

Transportation demand management programs can achieve valuable reductions in private auto use for projects of this nature. However, the Plan only factors in a very modest 5% trip reduction for this. Far higher levels of TDM participation, on the order of 20%, are achievable. The full potential of an ambitious TDM program should be a required element of the proposal, not just a possibility.

Recommendations for 5.
In order to achieve the highest possible trip and GHG reductions, the Plan should commit to a TDM participation level of 20%. The Plan should also commit to monitoring protocols to assure that TDM targets are being met and include procedures to increase participation if they aren't.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. It should be noted that the 5% estimate was intentionally conservative, as assumptions that large percentages of employees will use alternative modes in Los Angeles are typically met with skepticism by the general public. It is likely that the TDM program proposed for the Project will easily exceed the trip generation reduction assumption of 5%. However, requiring the Project to set – and achieve – a blanket target of 20% reduction is not warranted. Even if trip generation were reduced an additional 15% due to the TDM program, it would not result in an additional reduction of significant impacts from the three identified under Existing with Project with Mitigation Conditions (year 2012) and the four identified under Future with Project with Mitigation Conditions (year 2022). Therefore, a higher TDM goal is not warranted by the analysis. Further, the Federal Aviation Administration, which originally supplied the funds to buy the land the Project sits on decades ago, has ultimate say in what is acceptable mitigation for the Project, and would not support paying for measures that have no direct nexus to reducing Project significant impacts.

LAXN-PC25-7
Comment:

6. New construction and urban design does not meet high enough levels of green building and sustainable urban design practices

The project's commitment to sustainability is encouraging, but CalGreen Tier One is far too modest and sacrifices energy saving and sustainability potentials that are needed NOW. Also, because of the scale of the project, it should strive to meet LEED ND (Neighborhood Development) to better address sustainable urban design, mobility and land use sustainability considerations. A suburban-style, automobile-dependent plan is simply unacceptable in the face of urgent environmental, conservation and climate change concerns. The plan already incorporates many desirable features in this regard but is lacking in many ways.

Recommendations for 6.
A much higher CalGreen or LEED plus LEED ND or equivalent should be a requirement of all design, site plans and construction.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. The proposed Project includes multiple sustainability features, including but not limited to the following:

- The proposed landscape design guidelines address sustainability by requiring the use of native plant species in all landscape areas. In the required 100-foot buffer on the northern edge of Area 2 and the 20-foot buffer on the northern edge of Area 1, 100% native plant species will be used. In all recreation and airport support areas, 80% of all plant species will be required to be native. In all development and parking areas, 60% of all landscaping will be required to be native. All landscaped setback areas would be required to contain 50% native species and the paseo along Westchester Parkway would be required to contain 30% native species (Draft EIR Section 2.4.1.5).
- The proposed Project would comply with the mandatory requirements for nonresidential buildings including Tier 1 conformance of the City of Los Angeles Green Building Code (Draft EIR Table 4.6-2). These include providing bicycle parking and changing rooms, short- and long-term bicycle parking, electric vehicle wiring, light pollution reduction, energy efficiency requirements (including appliances), solar installation wiring, water efficiency measures, and air quality and indoor air quality control.
- The proposed Project requires permeable pavers and porous paving materials in parking stalls (PDF HW-14), as well as bioswales (PDF HW-10).
- LAX Master Plan EIR/EIS Commitments apply to the proposed Project, including E-1: Energy Conservation and Efficiency Program; E-2: Coordination with Utility Providers; SW-1 Implement an Enhanced Recycling Program; SW-2: Requirements for the Use of Recycled Materials during Construction; SW-3; Requirements for the Recycling of Construction and Demolition Waste; W-1: Maximize Use of Reclaimed Water, and W-2: Enhance Existing Water Conservation Program (Draft EIR Section 4.15.3.3).
- The proposed Project includes Project Design Features to further sustainability, including but not limited to: PDF U-1 through PDF U-17 that promote water use reduction and wastewater reduction and PDF U-19 and PDF U-20 that require light roofs and energy efficient lighting (Draft EIR Section 4.14-3).

The proposed Project lacks significant impacts that warrant additional sustainability requirements.

While the proposed Project accommodates vehicles, it also supports multiple modes of transportation and is not automobile-dependent. As shown in Table 2-2 LAX Northside

Plan Update Land Use Categories of the Draft EIR, the proposed Project Mixed Use-Commercial land use category would allow a transit station. As noted in section 4.14.4.1 Transportation Mitigation Program of the Draft EIR, LAWA would work with Metro and LADOT during project design to identify a suitable location on the Project site which would be dedicated for potential future development of a transit site. Per PDF LU-19, the proposed Project would encourage multiple modes of transportation by reserving a location for a potential light-rail station in the LAX Northside Center District, enhancing pedestrian connections, and including bicycle facilities such as lockers and showers. Bike racks shall be located adjacent to walkways, near building entrances, intersections, transit stations, bus shelters, and any other pedestrian gathering areas. Spacing shall be at a maximum distance of one thousand (1,000) feet and in clusters of three (3). The proposed Project also includes a Transportation Demand Management Program (TDM) as noted in Section 4.14.4.1 of the Draft EIR. The TDM program would implement a number of programs for employers and employees including education and awareness of travel options, promoting biking and walking, providing ridesharing services and transportation assurance programs, and providing incentives for using alternative modes of travel.

The proposed Project is more accurately described as "infill" development, rather than suburban development. The Project site is surrounded by heavily urbanized industrial and commercial uses to the east and south at LAX, as well as densely developed residential areas to the north. Additionally, the proposed Project Design Features seek to concentrate development along Westchester Parkway and near the existing Westchester Business District rather than allowing it to be spread throughout the site in a more suburban design scheme. For example, in the largest portion of the Project site (Area 2), the proposed Project requires that a minimum of 65 percent of the ground floor building square footage be located within 250 feet of the Westchester Parkway Property Line, per Project Design Feature (PDF) Land Use (LU)-52. Clustering development in this fashion will allow more of the Project site to be landscaped as opposed to developed with buildings.

As the proposed Project may be developed by multiple or a single developer, requiring LEED Neighborhood Development certification would be an inflexible requirement. As noted by the United States Green Building Council in *LEED 2009 for Neighborhood Development* "the owner or owners applying for certification should already own, have title to, or have significant control over a majority of the land within the project boundary and the plan for new construction or major renovation for the majority of the project's area." Whether the Project site will be developed by a single or multiple parties is unknown at this time. However, as described above the proposed Project includes many sustainability features and does not preclude project developers from applying for and achieving LEED ND certification.

LAXN-PC26 **Lore Pekrul** **None Provided** **7/21/2014**

LAXN-PC26-1
Comment:

The great scarcity of open-space acreage within several miles of coastline along Santa Monica Bay places the LAX Northside Plan area in a unique, remnant class of its own. While the present plans are an improvement over the 1980s plan, they come nowhere near where they should be—and it is indicative that the planning process has been governed by the out-dated requirements of the governing LAX Plan and Specific Plan.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

LAXN-PC26-2
Comment:

The value of the land extends far beyond a simplistic "fair market value" return conception. The land, protected, could be used as a lever to ensure revitalization of the Westchester business district east of Sepulveda—as well as similar alignment with inland areas of Inglewood. An appropriate LAX Northside plan should retain most open space as habitat—perhaps protected or punctuated by several small scale (but highly significant) corporate headquarters, built to LEED Platinum, Net Zero Energy or Living Building Challenge standards, characterized by a car-free nature, and acting as a catalyst to reduce car dependency in local communities. A well sited soccer field would also seem appropriate, but only if accessible by community trams deployed from neighboring areas.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

In the largest portion of the Project site (Area 2), the proposed Project requires that a minimum of 65 percent of the ground floor building square footage be located within 250 feet of the Westchester Parkway Property Line, per Project Design Feature (PDF) Land Use (LU)-52. Clustering development in this fashion will allow more of the Project site to be landscaped as opposed to developed with buildings.

The proposed Project also supports alternative modes of transportation. As shown in Table 2-2 LAX Northside Plan Update Land Use Categories of the Draft EIR, the proposed Project Mixed Use-Commercial land use category would allow a transit station. As noted in section 4.14.4.1 Transportation Mitigation Program of the Draft EIR, LAWA would work with Metro and LADOT during project design to identify a suitable location on the Project site which would be dedicated for potential future development of a transit site. Per PDF LU-19, the proposed Project would encourage multiple modes of transportation by reserving a location for a potential light-rail station in the LAX Northside Center District, enhancing pedestrian connections, and including bicycle facilities such as lockers and showers. Bike racks shall be located adjacent to walkways, near building entrances, intersections, transit stations, bus shelters, and any other pedestrian gathering areas. Spacing shall be at a maximum distance of one thousand (1,000) feet and in clusters of three (3).

As described in the Draft EIR Section 2.4.1.4, development of the Project site must achieve fair market value per FAA regulations. Therefore, development rights will be assigned to open space areas and transferred to commercial development areas to ensure that a fair market value is achieved for all areas. The majority of the Project site cannot be dedicated to open space as this would conflict with FAA regulatory requirements.

As described in response to Comment LAXN-PC-25-7, the proposed Project lacks significant impacts that warrant additional sustainability requirements. Therefore there is no justification for the additional LEED Platinum, Net Zero Energy or Living Building Challenge standards requested in this comment.

LAXN-PC26-3
Comment:

The incorporation of community feedback into the plan is extremely important. However, it is equally important that the plan reflect leading edges of green urban land use scenarios—both theory and practice. This is not entirely the case. Designers can only design as well as the client will allow. As client, LAWA should call for the furthest cutting edge of design and practice—including new ways of seeking a return on value. An economic relationship among Westchester business districts, neighboring districts in

Inglewood and the LAX Northside Plan area could be put into place such that the economic return for the common revitalization district would exceed what has been envisioned—perhaps with flows of capital returns moving from inland areas that benefit from a stellar LAX Northside update.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. The proposed Project included extensive community outreach and community and stakeholder input was incorporated into the proposed Project. Approximately 25 individual community members served on a Community Leaders panel that advised LAWA over a multi-year process. Hundreds of individual community members were involved in scoping meetings, design charrettes, one-on-one meetings and open houses throughout the process. Finally, LAWA presented to and obtained input from multiple community organizations, including but not limited to Neighborhood Council of Westchester/Playa, Westchester Rotary Club, Westchester Play Del Rey Youth Foundation, St. Bernard High School, Westchester Family YMCA, Westchester Streetscape Improvement Association, Westchester Vitalization Corporation, Westchester High School, Westchester Neighborhood Association, Friends of Ballona Wetlands, and home owners associations in various local neighborhoods. Community input resulted in the proposed Project land use types, distribution of land uses throughout the Project site, design and placement of the paseo, landscape palette, location of buffers, setbacks, and stepbacks, and multiple Project Design Features.

As described in response to Comment LAXN-PC-25-7, the proposed Project includes multiple sustainability features that reflect the leading edges of green urban land use scenarios. Additionally, the proposed Project does not preclude future developers and designers from introducing new sustainability features.

No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the LAX Northside Plan Update Draft EIR (Public Resources Code Section 21091(d); State CEQA Guidelines Section 15204(a)).

LAXN-PC27 **Matthew Hetz** **None Provided** **7/21/2014**

LAXN-PC27-1

Comment:

I find troubling the proposal for athletic fields and exercise space at the LAX NORTHSIDE Development. At such close proximity to LAX, there is no way to mitigate the pollution from the many vehicles at the airport, and particularly from the planes. There are no pollution controls on the planes, jet engines and propellers, so this exhaust/pollution will spill directly towards the exercise areas which are too close. Recent studies show that the pollution from the planes at LAX negatively affect surrounding neighborhoods for thousands of feet, and the LAX NORTHSIDE will be within hundreds of feet.

Furthermore, from the Westchester Business District parking lots I can smell the burning rubber from the tires of landing aircraft. This is a huge source of particulate matter pollution which will also spill onto LAX NORTHSIDE and the recreation/exercise areas.

Both of these, jet exhaust and tires burning and shredding on landing, are dangerous for those just living near the airport, but when a person is exercising their airways open and they breath deeper making them more susceptible to these harmful pollutants.

Response:

The comment raises concern about athletic fields and exercise space proposed as part of the LAX Northside Project. In Section 8 of the Air Quality Technical Report (Draft EIR

Appendix C p. 25 to p. 27), the potential impacts of siting recreational areas within the LAX Northside Project are discussed. In Section 7.1 of the Air Quality Technical Report (Draft EIR Appendix C p. 24) and Section 4.2.4 of the Draft EIR (p. 4.2-45), the potential impacts from airport operations onto LAX Northside are also discussed. It should also be noted that the potential location of athletic fields and exercise space is relatively close to the Pacific Ocean. This location provides relatively better air quality conditions when compared to most of the South Coast Air Basin as shown by the SCAQMD monitoring data. The monitoring data from the nearby SCAQMD air monitoring station is shown in Table 4.2-3 (Draft EIR p. 4.2-12), additional data for the South Coast Air Basin can be found on the SCAQMD website.[19] The comment does not otherwise raise any specific issue regarding the analysis and, therefore, no more specific response can be provided or are required. Furthermore, CEQA requires that an EIR "shall identify and focus on the significant environmental effects of the proposed project"[20] and does not require an EIR to assess the impacts of the existing environment. Thus, it is out of scope of the document to analyze and reduce the emissions that are not Project emissions, or the impact of existing emissions on the proposed Project.

LAXN-PC27-2
Comment:

Instead of building exercise areas at LAX NORTHSIDE, which pose a health hazard, the money should instead be used to build new exercise areas somewhere else in Westchester, and other surrounding areas far enough away to not be subject to airport pollution.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. The comment does not raise any specific issue regarding the air quality analysis and, therefore, no specific response can be provided or is required. Nevertheless, health impacts on people using open space and recreational areas at the Project site would be similar to other areas in Los Angeles. Furthermore, as discussed in in Section 4.2.3.1.3, the LAX Northside Project health risk assessment shows that that the health risk impacts from the Project are below the SCAQMD significance thresholds. As discussed in Section 4.2.2.2.3, existing Health Risk in the Project Area of the Draft EIR, based on the Multiple Air Toxics Exposure Study III Los Angeles County map, which was the most recently available map to represent existing conditions near the Project area, when the Draft EIR was prepared and released, the estimated lifetime cancer risk from exposure to Toxic Air Contaminants for those residing within the vicinity of the Project site is estimated at 884 cancers per million, while the vast majority of the area surrounding LAX ranges between 500 to 1,200 cancers per million.[21] However, the visual resolution available in the map is 1 kilometer by 1 kilometer and, thus, impacts for individual neighborhoods are not discernible on this map. In general, the risk of the Project site is comparable with other areas in the Los Angeles area; the risk from air toxics is lower near the coastline, and increases inland, with higher risks concentrated near large diesel sources (e.g., freeways, airports, and ports). This location also provides relatively better air quality conditions when compared to most of the South Coast Air Basin as shown by the SCAQMD monitoring data. The monitoring data from the nearby SCAQMD air monitoring station is shown in Table 4.2-3 (Draft EIR p. 4.2-12), additional data for the

[19] Available at: http://www.aqmd.gov/home/library/air-quality-data-studies/historical-data-by-year. Accessed: August, 2014.
[20] California Public Resources Code Sections 21080, 21082.2, 21100, 21151 or 14 CCR § 15126.2.
[21] In October 2014, SCAQMD released a draft MATES-IV report which concludes that cancer risk has decreased more than 50% between MATES-III and MATES-IV periods. An Interactive map based on MATES-IV model-calculated cancer risks shows that TAC cancer risk in the area around the Project site ranges from 334 to 615 in a million. (Ref: SCAQMD. 2014. MATES IV Draft Report. Available at: http://www.aqmd.gov/home/library/air-quality-data-studies/health-studies/mates-iv, Accessed: October 14, 2014.)

South Coast Air Basin can be found on the SCAQMD website.[22] Therefore, building open space and recreational uses at the Project site would have similar health impacts as building in other areas in the Los Angeles Area based on existing conditions. The comment does not otherwise raise any specific issue regarding the air quality analysis and, therefore, no more specific response can be provided or is required.

Additionally, as noted in Section 2.6.2 Community Compatibility, Urban Design Guidelines, and Sustainability of the Draft EIR, the proposed Project objectives include reflecting current community and stakeholder interests for additional open space and recreational facilities. Inclusion of open space and recreation uses in the proposed Project meets this objective.

[22] Available at: http://www.aqmd.gov/home/library/air-quality-data-studies/historical-data-by-year. Accessed: August, 2014.

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3 Corrections and Additions to the Draft EIR

3.1 Introduction

As provided in Section 15088(d) of the California Environmental Quality Act Guidelines, responses to comments may take the form of a revision to a Draft Environmental Impact Report (EIR) or may be a separate section in the Final EIR. This chapter complies with the latter of these two guidelines and provides changes as a result of clarifications to, and comments received on, the Draft EIR for the LAX Northside Plan Update (proposed Project). The following revisions are hereby made to the text of the Draft EIR. Changes in text are signified by ~~strikeouts~~ where text is removed and shown with <u>underline</u> where text is added, unless otherwise noted. These changes do not add significant new information to the EIR, nor do they disclose or suggest new or more severe significant environmental impacts of the proposed Project.

3.2 Corrections and Additions to the Draft EIR Text

The following changes to the text as presented below are incorporated into the Final EIR:

Chapter ES, Executive Summary

Revise Table ES-2 in Section ES.1.3 in Section ES Executive Summary as follows:

Table ES-2

Land Uses, Heights, and Square Footage Permitted Under the Proposed Project

Area	Permitted Land Use Category[a]	Maximum Height From Grade	Net New Square Footage
Area 12A West	Community and Civic	~~30'~~ <u>20'</u>	130,000

Chapter 2.0, Project Description

Revise Section 2.4.1.2 Proposed Land Uses and Illustrative Site Plan in Section 2.0 Project Description as follows:

<u>LAX Northside Campus District</u>

~~The LAX Northside Campus is planned as a low to mid-rise, retail and office environment extending from Sepulveda Westway to Lincoln Boulevard. Vehicular access will be allowed~~

~~primarily off of Westchester Parkway, with secondary access allowed along La Tijera Boulevard and Sepulveda Westway.~~

~~Building stepbacks and setbacks along Westchester Parkway and La Tijera Boulevard are planned to create a pedestrian environment that works with the proposed paseo and consolidates pedestrian activity along primary building frontages.~~

The LAX Northside Campus District is planned as a low-rise, low density office, and research and development park extending from Lincoln Boulevard west to Pershing Drive. Site access will be controlled, with project entry points planned as major design features along Westchester Parkway, incorporating graphic and landscape elements.

Along the north side of Westchester Parkway, buildings will be diverse in design character but will maintain a relationship to the street. Wider setbacks are required at major access points, while smaller setbacks are required elsewhere to create a campus-like environment. These design strategies are intended to reinforce a pedestrian scale within each development that integrates with the Westchester pedestrian paseo.

LAX Northside Center District

~~The LAX Northside Center District is planned as a low-rise, low density office, and research and development park extending from Lincoln Boulevard west to Falmouth Avenue. Site access will be controlled, with project entry points planned as major design features along Westchester Parkway, incorporating graphic and landscape elements.~~

~~Along the north side of Westchester Parkway, buildings will be diverse in design character but will maintain a relationship to the street. Wider setbacks are required at major access points are located with smaller setbacks required elsewhere to create a campus-like environments. These design strategies are intended to reinforce a pedestrian scale within each development that integrates with the Westchester pedestrian paseo.~~

The LAX Northside Center District is planned as a low to mid-rise, retail and office environment extending from Sepulveda Westway to Lincoln Boulevard. Vehicular access will be allowed primarily off of Westchester Parkway, with secondary access allowed along La Tijera Boulevard and Sepulveda Westway.

Building stepbacks and setbacks along Westchester Parkway and La Tijera Boulevard are planned to create a pedestrian environment that works with the proposed paseo and consolidates pedestrian activity along primary building frontages.

Revise Table 2-3 in Section 2.4.1.2 Proposed Land Uses and Illustrative Site Plan in Section 2.0 Project Description as follows:

Table 2-1

Land Uses, Heights, and Square Footage Permitted Under the Proposed Project

Area	Permitted Land Use Category[a]	Maximum Height From Grade	Net New Square Footage
Area 12A West	Community and Civic	~~30'~~ 20'	130,000

Revise Section 2.4.1.2.1 LAX Northside Center District in Section 2.0 Project Description as follows:

2.4.1.2.1 LAX Northside Center District

Area 12A (East and West)

Area 12A West to the west of Emerson Avenue would permit development of community, civic, cultural, or other nonprofit uses with building heights of up to ~~30~~ 20 feet high from grade with 15-foot setbacks from Westchester Parkway and Emerson Avenue.

Revise Section 2.4.1.3 Transfers of Development Rights and Land Use Equivalency Program in Section 2.0 Project Description as follows:

2.4.1.3 Transfers of Development Rights and Land Use Equivalency Program

In no event would the total development within the Project site exceed 2,320,000 net new square feet or be allowed to generate more than the ~~23,636~~ 23,635 total daily vehicle trips ~~currently allowed by the LAX Specific Plan~~.

Chapter 3.0, Overview of Project Setting

Revise Section 3.4 Related Projects in Chapter 3.0 Overview of Project Setting as follows:

3.4 Related Projects

For this Draft EIR, ~~104~~ 115 projects meet the criteria described above. As shown in **Tables 3-1**, general types of projects include, but are not limited to, transit, airport modernization, residential, school, mixed use, and commercial projects.

3.4 Related Projects

Revise Table 3-1 in Chapter 3.0 Overview of Project Setting as follows:

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Table 3-1

Related Projects

ID	Related Project	Address	City	Land Use Type	Development Proposed (ksf or unit)	Description
105	Village at Playa Vista	Playa Vista	Los Angeles	Open Space, Residential, Office, Retail, Community Serving	2,600 units 175 ksf office 150 ksf retail 40 ksf community	Master planned community of residential, commercial, recreational, and community-serving uses.
106	Sony Pictures Studios Comprehensive Plan	10202 West Washington Boulevard	Culver City	Office, Including Health Club, Dining	218.45 ksf office building 51.716 ksf production support	New eight-story, 218,450 sf office building, new 51,716 sf production services building, demolition of existing 57,642 sf production support building, parking structure expansion.
107	Washington/Landmark	8810 Washington Boulevard	Culver City	Commercial, Office	38.732 ksf office 41.745 ksf retail and restaurant	Comprehensive plan and planned development district for new commercial development.
108	Legado Mixed Use TOD	8770 Washington Boulevard	Culver City	Mixed Use	115 unit 31.24 ksf retail	Mixed use transit oriented development.
109	Office and Retail Building	700 Corporate Pointe	Culver City	Creative Office	240.612 ksf office 4.242 ksf retail	Creative office and parking structure.
110	Parcel B	9300 Culver Boulevard	Culver City	Retail, Office	74.6 ksf office 21.7 ksf restaurant 21.7 ksf retail	Retail, office on approximately one acre site.
111	Triangle Site-Washington/National TOD	NW Corner of Washington and National	Culver City	Mixed Use	290 units 149 hotel rooms 200 ksf office 51.5 ksf retail 20 ksf	New transit oriented development

Table 3-1

Related Projects

ID	Related Project	Address	City	Land Use Type	Development Proposed (ksf or unit)	Description
					restaurant	
112	West Los Angeles College Master Plan	9000 Overland Ave.	Culver City	Educational	41.28 ksf technology center 16 ksf sound stage 43 ksf office building 24 ksf student annex 13 ksf performing arts center	Reductions and/or elimination of all major components included in the 2009 Facilities Master Plan, changes to construction staging locations.
113	Culver Studios Amendment No. 6	9336 Washington Boulevard	Culver City	Office	Phase I: 25.093 ksf office 13.634 ksf support Phase II: 63.5 ksf office 8.741 ksf support	Office space at Culver Studios
114	Marina del Rey Visioning	Marina del Rey	Marina del Rey, Unincorporated Los Angeles County	Retail, open space, residential, hotel	N/A	Planning effort to develop a vision for Marina del Rey for the next 20 years. Visioning process does not include amendments to Local Coastal Plan or new proposed development.
115	AMLI Residential Development	Marina del Rey, Parcel 15	Marina del Rey, Unincorporated Los Angeles County	Residential, commercial	585 units 8 ksf commercial	Demolition of existing buildings and new construction of 6 buildings, up to 5 stories, 585-unit apartment complex, new 8,000 sq ft commercial space, new 241 boat slip marina and new 1,271 parking space garage.

Chapter 4.0, Environmental Impact Analysis

Revise Section 4.2.3.3.2 Project Design Features in Section 4.2 Air Quality as follows:

4.2.3.3.2 Project Design Features

- **PDF AQ-2:** Capping the maximum number of trips generated by the LAX Northside at ~~23,636~~ 23,635 total daily vehicle trips.
- **PDF AQ-4:** Provide a minimum number of electric vehicle charging stations, which is equal to 5% of the total number of parking spaces.
- **PDF AQ-5**: Provide necessary infrastructure (wiring and plugs) at appropriate locations on the proposed Project site that can be used for electric landscaping equipment.
- **PDF AQ-6:** Watering three times daily to reduce fugitive dust emissions.
- **PDF AQ-7:** On-road trucks used on LAX construction projects with a gross vehicle weight rating of at least 19,500 pounds shall, at a minimum, comply with USEPA 2010 on-road emission standards for Particulate Matter less than 10 microns in diameter (PM_{10}) and Oxides of nitrogen (NO_x)[1]. Contractor requirements to utilize such on-road haul trucks or the next cleanest vehicle available will be subject to the provisions of LAWA Air Quality Control Measure 2"x" (part of LAX Master Plan Commitment LAX-AQ-2, LAX Master Plan – Mitigation Plan for Air Quality; Construction-Related Measures).
- **PDF AQ-8:** All off-road diesel-powered construction equipment greater than 50 horsepower shall meet, at a minimum, US EPA Tier 3 off-road emission standards. In addition, all off-road diesel powered construction equipment greater than 50 hp with engines meeting USEPA Tier 3 off-road emission standards shall be retrofitted with a CARB-verified Level 3 Diesel Emissions Control Strategies (DECS). Any emissions control device used by the Contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. Wherever feasible, all off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards. In the event the Contractor is using off-road diesel-powered construction equipment with engines meeting the Tier 4 off-road emission standards and is already supplied with a factory-equipped diesels particulate filter, no retrofitting with DECS is required. Contractor requirements to utilize Tier 3 equipment or next cleanest equipment available will be subject to the provisions of LAWA Air Quality Control Measure 2"x" (part of LAX Master Plan Commitment LAX-AQ-2, LAX Master Plan – Mitigation Plan for Air Quality; Construction-Related Measures). LAWA will encourage construction contractors to apply for SCAQMD "SOON" funds to accelerate clean-up of off-road diesel engine emissions.
- **PDF AQ-9**: LAWA will provide informational materials to developers regarding building materials that do not require painting.

Revise Table 4.2-12 in Section 4.2.3.4.3 Human Health Risk Impacts in Section 4.2 Air Quality as follows:

[1] While the mitigation measure commits to using trucks that meet the USEPA 2010 standards for on-road heavy-duty trucks, the analysis conservatively assumes the use of trucks that meet the 2007 standards for on-road heavy-duty trucks.

Table 4.2-12

Health Risk Assessment from Construction and Operational Activities

Health Endpoint	Receptor	Maximum Estimated Incremental Risk [1] (Risk in 1 million)	SCAQMD Threshold (Risk in 1 million)
Cancer Risk	Resident	1.1	10
	Worker	~~1.5~~ 1.3	10
	Sensitive	0.8	10
Health Endpoint	**Receptor**	**Maximum Estimated Hazard Index [1]**	**SCAQMD Threshold**
Chronic Non-Cancer Hazard Index	Resident	0.007	1.0
	Worker	~~0.007~~ 0.005	1.0
	Sensitive	0.005	1.0
Acute Non-Cancer Hazard Index	Resident	0.001	1.0
	Worker	0.001	1.0
	Sensitive	0.001	1.0
	Other[2]	0.001	1.0

Notes:

[1] Based on emissions from LAX Northside and Westchester Stormwater BMP. Note, Westchester Stormwater BMP is a related project that will be analyzed and approved separate from the LAX Northside Project; however, it is included for purposes of the analysis to provide a more conservative estimate of potential impacts.

[2] "Other" refers to receptors located on the Project fence line and over open water.

Revise Section 4.2.3.5 Transfer Program in Section 4.2 Air Quality as follows:

4.2.3.5 Transfer Program

The construction emissions associated with the proposed Project (~~Table 4.2-12~~Table4.2-8) are directly proportional to the square footage of the proposed Project. As a result, the floor area transfers are not expected to change the criteria pollutant emissions from construction of the proposed Project.

As seen in ~~Table 4.2-14~~Table 4.2-9, the primary sources of operational criteria pollutant emissions are mobile sources. The effect of floor area transfers on mobile sources is discussed in Section 4.14, *Traffic and Transportation*. Besides mobile sources, area sources are also a significant contributor to VOC emissions.

As described in Section 4.14.3.4.8 of the *Traffic and Transportation* section of this EIR, the floor area transfers will be based on a Land Use Equivalency Program that utilizes conversion factors that are based on trip generation characteristics of the permitted uses. This approach ensures that the maximum number of trips generated by the proposed Project will not exceed the ~~23,636~~ 23,635 total daily vehicle trip maximum. Since the criteria pollutant emissions from mobile sources are proportional to the number of trips, the floor area transfers are not expected to change the criteria pollutant emissions from the mobile sources.

Revise Section 4.2.4 Cumulative Impacts in Section 4.2 Air Quality as follows:

4.2.4 Cumulative Impacts

As shown in ~~Table 4.2-12~~Table 4.2-8, construction of the proposed Project would exceed the Project-specific significance threshold for VOC. As a result, the proposed Project would have a cumulatively considerable contribution for construction emissions and would result in a cumulatively significant construction impact. As shown in ~~Table 4.2-13~~Table 4.2-9, operation of the proposed Project would exceed the Project-specific significance thresholds for VOC and NO_X. Thus, the proposed Project would have a cumulatively considerable contribution for operational emissions and would result in a cumulatively significant operational impact. As discussed above, the Project would not exceed any health risks or hazard thresholds, therefore, the Project would be cumulatively less than significant for health risks or hazard thresholds.

Revise Section 4.3.3.3 Project Design Features in Section 4.3 Biological Resources as follows:

4.3.3.3 Project Design Features

- **PDF B-18:** The proposed Project contractor shall utilize integrated pest/rodent management measures wherever feasible during construction in the LAX Northside Campus District, including efforts such as using pest-resistant or well-adapted native plant varieties; removing weeds by hand and avoiding the use of chemical pesticides, herbicides, and fertilizers; and maintaining the construction site free of unsealed food or open trash that could attract rodents.

Revise Section 4.6.3.3.2 Project Design Features in Section 4.6 Greenhouse Gas Emissions as follows:

4.6.3.3.2 Project Design Features

- **PDF GHG-4:** Provide a minimum number of electric vehicle charging stations, which is equal to 5% of the total number of parking spaces.
- **PDF GHG-5:** Provide necessary infrastructure (wiring and plugs) at appropriate locations on the proposed Project site that can be used for electric landscaping equipment.
- **PDF GHG-6:** All off-road diesel-powered construction equipment greater than 50 horsepower shall meet, at a minimum, US EPA Tier 3 off-road emission standards. In addition, all off-road diesel powered construction equipment greater than 50 hp with engines meeting USEPA Tier 3 off-road emission standards shall be retrofitted with a CARB-verified Level 3 Diesel Emissions Control Strategies (DECS). Any emissions control device used by the Contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. Wherever feasible, all off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards. In the event the Contractor is using off-road diesel-powered construction equipment with engines meeting

the Tier 4 off-road emission standards and is already supplied with a factory-equipped diesels particulate filter, no retrofitting with DECS is required. Contractor requirements to utilize Tier 3 equipment or next cleanest equipment available will be subject to the provisions of LAWA Air Quality Control Measure 2"x" (part of LAX Master Plan Commitment LAX-AQ-2, LAX Master Plan – Mitigation Plan for Air Quality; Construction-Related Measures). LAWA will encourage construction contractors to apply for SCAQMD "SOON" funds to accelerate clean-up of off-road diesel engine emissions.

Revise Section 4.6.3.5 Transfer Program of Section 4.6 Greenhouse Gas Emissions as follows:

4.6.3.5 Transfer Program

As described in Section 4.14.3.4.8 of the *Traffic and Transportation* chapter of this EIR, the floor area transfers will be based on a Land Use Equivalency Program that utilizes conversion factors that are based on trip generation characteristics of the permitted uses. This approach ensures that the maximum number of trips generated by the proposed Project will not exceed the ~~23,636~~ 23,635 total daily vehicle trip maximum. Since the GHG emissions from mobile sources are proportional to the number of trips, the floor area transfers are not expected to change the GHG emissions from the mobile sources.

Revise Section 4.7.3.3.2 Project Design Features of Section 4.7 Hazards/Hazardous Materials as follows:

4.7.3.3.2 Project Design Features

- **PDF H-17**: The proposed Project would not permit the research, development, or testing of hazardous and/or biological materials in the Research and Development land use designation.

Revise Section 4.8.4.1.1 Groundwater in Section 4.8 Hydrology and Water Quality as follows:

4.8.4.1.1 Surface Water

As discussed in Section 4.8.3.4.1, impacts related to surface water hydrology would be less than significant for the proposed Project. The existing Project drainage system consists of catch basins, subsurface storm drains and open channel, and outfalls. The Argo Drain is the storm water outfall for surface runoff captured on site. Project runoff discharged into the Argo Drain system along the LAX perimeter flows several miles off-shore and is released into the Pacific Ocean via a 10-foot diameter pipe. The surface body of water of concern receiving runoff from the Project site is the Santa Monica Bay, an embayment of the Pacific Ocean. The proposed Project in conjunction with the ~~106~~ 115 related projects identified in Section 3.0 Environmental Setting would cumulatively increase stormwater runoff flows to the Argo Drain system and the Santa Monica Bay potentially resulting in cumulative impacts to surface water hydrology. However, each of these projects would be required to comply with LARWQCB, County of Los Angeles, and their respective city's regulations when designed and developed. These related projects would have SWPPPs for construction and SUSMPs for operations when required by the respective agencies and regulations, and would implement BMPs and other measures to manage stormwater runoff. The region where the related projects are located is highly urbanized and therefore has little potential to substantially increase regional runoff levels from existing conditions. In addition, each development would be analyzed during the compliance review for future buildout and implementation of the proposed Project, and would ensure that

sufficient drainage exists or is developed both locally and within the region to handle runoff from each project. Therefore, cumulative impacts to surface water hydrology would be less than significant.

Revise Section 4.8.4.1.2 Groundwater in Section 4.8 Hydrology and Water Quality as follows:

4.8.4.1.2 Groundwater

As discussed in Section 4.8.3.4.1, impacts related to groundwater hydrology would be less than significant for the proposed Project. The proposed Project is not anticipated to directly reach groundwater and would not substantially change the flow, level, or utility of existing groundwater. Impacts to groundwater hydrology would be minor and very localized, and would not have any measurable regional effect. Furthermore, as groundwater beneath the Project site is not utilized for municipal, agricultural, or drinking water purposes, these changes to groundwater recharge would not affect regional groundwater usage. The proposed Project in conjunction with the ~~106~~ 115 related projects identified in Section 3.0 Environmental Setting would have the potential to cumulatively decrease groundwater levels, affect groundwater flows, and decrease recharge. However, the region where the related projects are located is highly urbanized and therefore has little potential to decrease the amount of groundwater recharge from existing conditions. In addition, the West Coast Basin has set limits, as discussed in Existing Conditions, on the amount of groundwater that projects can remove from groundwater each year. All related projects would be required to comply with these regulations and would therefore not substantially deplete groundwater levels. As a result, wells and utilities would not be impacted in their ability to use potable groundwater. Structures requiring dewatering during construction and operations would be required to comply with all regulations regarding groundwater and would not substantially affect the flow of groundwater. Therefore, cumulative impacts related to groundwater hydrology would be less than significant.

Revise Section 4.8.4.2.1 Surface Water in Section 4.8 Hydrology and Water Quality as follows:

4.8.4.2.1 Surface Water

The proposed Project in conjunction with the ~~106~~ 115 related projects identified in Section 3.0 Environmental Setting would have the potential to cumulatively impact surface water quality. However, these related projects would all be subject to the same regulations as the proposed Project, including NPDES permits, TMDLs, and LARWQCB, County of Los Angeles, and cities' requirements. Construction of each individual project would be anticipated to be managed with a SWPPP and operations would be anticipated to be managed with a SUSMP where applicable. In addition, the region where the related projects are located is highly urbanized and therefore related projects would not be anticipated to substantially change regional water quality from existing conditions. The cumulative impacts of these projects along with the proposed Project would be less than significant.

Revise Section 4.8.4.2.2 Groundwater in Section 4.8 Hydrology and Water Quality as follows:

4.8.4.2.2 Groundwater

As discussed in Section 4.8.3.4.2, the proposed Project would have a less than significant impact on groundwater quality. Groundwater quality in the West Coast Basin is generally good. The proposed Project would have minimal effects on groundwater quality, and these impacts would be localized. The Project site is not used for municipal or agricultural purposes. The proposed Project in conjunction with the ~~106~~ 115 related projects identified Section 3.0

Environmental Setting would have the potential to cumulatively impact groundwater quality. However, these related projects would all be subject to the same regulations as the proposed Project, including NPDES permits and LARWQCB, County of Los Angeles, and cities' requirements. Construction of each individual project would be anticipated to be managed with a SWPPP and operations would be anticipated to be managed with a SUSMP where applicable. In addition, the region where the related projects are located is highly urbanized and therefore related projects would not be anticipated to substantially change infiltration of contaminants into groundwater from existing conditions. Therefore, cumulative impacts related to groundwater quality would be less than significant.

Revise Section 4.9.3.3.3 Project Design Features in Section 4.9 Land Use and Planning as follows:

4.9.3.3.3 Project Design Features

- **PDF LU-39:** Signage in the Northside Campus District is restricted to three feet in height. ~~The Northside Campus District will establish a maximum building square footage of 1,075,000.~~

Revise Section 4.9.3.4.1 Land Use Plan Consistency in Section 4.9 Land Use and Planning as follows:

4.9.3.4.1 Land Use Plan Consistency

LAX Northside Airport Support District

Community/Specific Plan

Table 4.9-13

Consistency with LAX Specific Plan Development Standards- LAX Northside Airport Support District

Topic	LAX Specific Plan	Proposed Project	Consistency Analysis
Square Feet of Permitted Development	Total of 4,500,000 square feet allowed as follows: Low-rise and mid-rise office: 1,580,000 sf Restaurant and Retail: 130,000 sf Hotel: 870,000 Research park: 1,170,000 Airport support: 750,000	Total of 2,320,000 square feet as follows: Office, research and development: 1,275,000 Mixed use-commercial: 220,000 Airport support: 600,000 Community and civic: 215,000 Open Space and Recreation: 10,000	**Consistent.** The proposed Project allows less total development and compatible land use types as existing standards.
Building Height	South of Westchester Parkway (Airport Support District): 45'-55', except in certain areas between Lincoln and Loyola Boulevards, where structures may be built up to the maximum heights achievable under FAA requirements.	Airport Support District: 30'	**Consistent.** The proposed Project has more restrictive height requirements than existing standards. The proposed Project establishes maximum heights across the Project site, whereas existing standards allow heights to increase up to FAA standards as development moves further north from the LAX North Airfield.

Table 4.9-13

Consistency with LAX Specific Plan Development Standards- LAX Northside Airport Support District

Topic	LAX Specific Plan	Proposed Project	Consistency Analysis
Building Setbacks	General: All buildings required to be set back a minimum of 750 feet from the LAX north runway centerline. South of Westchester Parkway (Airport Support District): At La Tijera and Westchester Parkway, buildings should be set back a minimum of 100 feet from an extension of the centerline of La Tijera Parkway. A minimum of 100 feet from the extension of the centerline of Falmouth Avenue, and from the centerline of each major entry drive.	General: Limited Development Area required in compliance with FAA guidelines. Airport Support District: 50 foot setback west of Lincoln Boulevard along Westchester Parkway, 15' setback east of Lincoln Boulevard along Westchester Parkway.	**Consistent:** The proposed Project has equal or greater setback requirements than existing standards in most areas. Along Westchester Parkway, some setbacks are smaller in the proposed Project to reinforce building orientation towards Westchester Parkway, which is consistent with the LAX Specific Plan policies.
Buffer Areas	None required	None required	**Consistent:** The proposed Project buffers and setbacks yield the same or greater separation between the proposed Project and existing residences as the existing standards.

Note:
sf = square feet
Source: City of Los Angeles, LAX Specific Plan, 2004; City of Los Angeles, Los Angeles World Airports, LAX Northside Design Guidelines and Standards, 2014; URS, 2014.

Revise Section 4.9.4 Cumulative Impacts in Section 4.9 Land Use and Planning as follows:

4.9.4 Cumulative Impacts

As indicated in Section 3.0, Environmental Setting, there are ~~34~~ 35 related projects that have been identified in the City of Los Angeles in the Project vicinity. Such related projects consist of mixed use commercial, office, retail, airport parking, airport modernization, transit, school, recreation, and residential uses. Approximately 18 of these projects are expansions of existing uses or on project sites that are currently developed and therefore would not conflict with existing land uses. The remainder of the related projects are separated from the Project site by intervening development or are at distances from the Project site that would preclude cumulative impacts.

Revise Section 4.10.2.6.3 Transfer Program in Section 4.10 Noise as follows:

4.10.2.6.3 Transfer Program

The proposed Project would include flexibility to allow for transfers of floor area within Districts. While transfers of floor area within Districts would be permitted, the maximum proposed Project total of 2,320,000 square feet may not be exceeded. Floor area transfers would not result in new impacts with regard to noise. Floor area transfers would not change the construction noise sources and operational stationary noise sources from what was analyzed within this Draft EIR section. Additionally, transfers between uses within Districts would be trip neutral, as they would have to comply with the LAX Northside Land Use Equivalency Matrix. Specifically, floor area transfers would not cause the number of total trips to exceed the estimated number of proposed Project vehicle trips (approximately ~~23,636~~ 23,635 total new daily trips) as analyzed in this Draft EIR. Therefore, as floor area transfers would be trip neutral, off-site traffic noise levels would be similar to those analyzed herein. In summary, floor area transfers would not alter the conclusions with regard to noise impacts. Should uses be transferred within the Districts, the resulting impacts would be similar to those evaluated herein.

Revise Section 4.10.3.2 Ground-Borne Vibration under Cumulative Impacts in Section 4.10 Noise as follows:

4.10.3.2 Ground-Borne Vibration

As discussed in Section 3.0 Environmental Setting, future growth including the development of ~~104~~ 115 related projects is anticipated in the Project site vicinity through 2022. Noise from construction activities associated with this future growth together with proposed Project-related construction activities could contribute to the cumulative noise impact for receptors located between the two construction sites. However, cumulative construction-related noise levels from future development would be intermittent and temporary. In addition, like the proposed Project, it is anticipated that future construction of related projects in the Project site vicinity would comply with time restrictions and other relevant provisions in the City's Municipal Code. Furthermore, noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for the related project.

Revise subsection Public Transit in Section 4.14.2.2.1 Existing Transportation System in Section 4.14 Traffic as follows:

4.14.2.2.1 Existing Transportation System

Public Transit

~~**Metro Local 42 and 42A**. Routes 42 and 42A are local lines that travel north-south on La Tijera Boulevard in the Project site vicinity with average headways of 35 minutes during the weekday morning and afternoon peak hours. These lines travel from the City of Los Angeles' downtown to the City of Hawthorne's downtown and provide service to LAX, the South Bay and the City of Inglewood.~~

Revise Table 4.14 -1 of Section 4.14 Traffic as follows:

Table 4.14-1

Existing Transit Service Patronage and Residual Capacity Lines Serving Project Periphery

Provider and Route	Number of Runs During Peak Hour[a]	Capacity[b]	Average Load[c]	Load Factor - Load/Capacity[d]	Residual Capacity per Run	Residual Capacity in Peak Hour[e]
Morning Peak Hour						
Metro Bus						
~~42~~	~~4~~	~~50~~	~~33~~	~~0.66~~	~~17~~	~~68~~
					Total Residual Capacity in Peak Hour	**~~2,415~~ 2,347**
Afternoon Peak Hour						
Metro Bus						
~~42~~	~~4~~	~~50~~	~~31~~	~~0.62~~	~~19~~	~~76~~
					Total Residual Capacity in Peak Hour	**~~2,492~~ 2,416**

Source: Gibson Transportation Consulting, ~~October 2013~~November 2014.

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Revise subsection Public Transit in Section 4.14.2.2.1 Existing Transportation System in Section 4.14 Traffic as follows:

4.14.2.2.1 Existing Transportation System

Public Transit

As indicated in **Table 4.14-1** above, all lines for which data was available have available capacity during the morning and afternoon peak periods. In total, it is estimated that the transit lines serving the Project site have combined residual capacity of at least ~~2,415~~2,347 transit patrons during the morning peak hour and ~~2,492~~2,416 transit patrons during the afternoon peak hour.

Revise subsection Related Projects in Section 4.14.3.1.2 Local Street System in Section 4.14 Traffic as follows:

4.14.3.1.2 Local Street System

Related Projects

A comprehensive list of ~~104~~115 related projects was compiled based on information provided by LADOT; the cities of Inglewood, El Segundo, Culver City, Manhattan Beach, and Hawthorne; the County of Los Angeles, and recent published reports for other projects. The list of Related Projects is provided in Table 9 in the Transportation Study for the LAX Northside Plan Updated in Appendix E of this EIR.

Revise Section 4.14.3.3.2 Project Design Features in Section 4.14 Traffic as follows:

4.14.3.3.2 Project Design Features

- **PDF T-15:** Once 50% of Area 11 and Area 12 are occupied on a square foot basis, LAWA will conduct a parking study to evaluate potential parking impacts of the proposed Project. Should significant parking impacts be found at that time, LAWA will mitigate them to a level less than significant.
- **PDF T-16:** The Project would require the installation of a crosswalk across Loyola Boulevard at 91st Street or a roundabout at the intersection of Loyola Boulevard and La Tijera Boulevard if a land use is put into the Project side of the street that requires or encourages pedestrians to cross from the Project Site to the other side of Loyola Boulevard.
- **PDF T-17:** When 50% of the Project is built on the basis of afternoon peak hour trip generation, the Project will form a Transportation Management Organization (TMO) which qualifying Project businesses would be required to join and other area businesses and residences would have the option to join. The TMO would take over the implementation, operation, and expansion of the TDM program and could seek to implement transportation improvements too large for individual businesses to implement.
- **PDF T-18:** The Applicant would work with Metro and LADOT during Project design to identify a suitable location on the Project site which will be dedicated for potential future

development of a transit station.[2] Prior to any development on the Project site, LAWA would work with Metro and LADOT to identify a suitable location for a potential transit station. That land would be preserved for that use by LAWA for a period of up to 10 years, after which, should Metro determine that it does not need to develop a transit station at that location, the site would become available for Project development.

- **PDF T-19:** The Project Applicant will notify any affected transit operators at least one week in advance any time that construction activities will hinder normal operation of a regularly scheduled transit route. Activities warranting notification could include closure of a sidewalk in the vicinity of a transit stop, closure of a bus stop, lane closures, road closures, and heavy truck activity along a transit route.
- **PDF T-20:** Upon completion of 55% of Project development, or 1,400 afternoon peak hour trips, the Project would complete or have completed the following improvement to Intersection #86, Sepulveda Boulevard & Jefferson Boulevard & Playa Street: Add a third eastbound left-turn lane, along with associated signage and traffic signal improvements. After implementation of the improvement, this intersection would provide two left-turn lanes, one shared left-turn/through lane, and one shared through/right-turn lane in the eastbound direction.

Revise subsection Future 2022 with Project Conditions in section 4.14.3.4.2 Local Street System in Section 4.14 Traffic as follows:

4.14.3.4.2 Local Street System

Future 2022 with Project Conditions

In addition to the 18 significantly impacted study intersections identified above under Future with Project conditions, an analysis of the intersections within Culver City using City of Los Angeles impact criteria identified one location where Project traffic would exceed the threshold, at Intersection #86, Sepulveda Boulevard & Jefferson Boulevard & Playa Street. This would not constitute a significant impact, but is provided as supplemental information. Further, an improvement to Intersection #86 is offered as a proposed Project condition of approval, described in Section 4.14.3.3.2, Project Design Features. The analysis of Culver City intersections using Los Angeles impact criteria is summarized in more detail in Appendix C of the Transportation Study in Appendix E.

Revise Section 4.14.3.4.5 Public Transit in Section 4.14 Traffic as follows:

4.14.3.4.5 Public Transit

An analysis of the existing and future transit system was conducted based on the residual capacity and projected transit usage growth through 2022, when full development of the proposed Project is anticipated. As described above, the transit system in the Study Area is currently estimated to have a residual capacity of approximately ~~2,415~~2,347 transit patrons during the morning peak hour and ~~2,492~~2,416 transit patrons during the afternoon peak hour. The transit system is projected in 2022 to have residual capacity of ~~2,107~~2,051 transit patrons during the morning peak hour and ~~2,175~~2,111 transit patrons in the afternoon peak hour.

[2] To be conservative, no additional transit credit, trip reduction, or capacity increase was assumed in this the transportation impact analysis related to this Project Design Feature.

Revise Section 4.14.4.1 Transportation Mitigation Program in Section 4.14 Traffic as follows:

4.14.4.1 Transportation Mitigation Program

The mitigation program consisting of the following four components:

- Implementation of a transportation demand management (TDM) program for the Project site to promote peak period trip reduction;
- Transportation Systems Management (TSM) improvements consisting primarily of right-turn detector systems at key intersections within the Study Area. TSM improvements may also include installation of detection lops, signal controller upgrades, and closed circuit television (CCTV) cameras;
- Transit system improvements, including the provision of new buses to increase public transit service along a key corridor within the Study Area ~~and the dedication of space for a potential future transit station on the Project site~~; and
- Specific intersection improvements.

Revise Section 4.14.4.1 Transportation Mitigation Program in section 4.14 Traffic as follows:

4.14.4.1 Transportation Mitigation Program

Transportation Demand Management

Compared with total Project trip generation before the implementation of the TDM program, the TDM program represents a reduction of 2.2 percent of daily trips, 3.8 percent of morning peak hour trips, and 2.7 percent of afternoon peak hour trips. These represent reasonable and conservative estimates of potential peak hour trip generation reduction. TDM programs in office buildings have been shown to be highly effective in Century City, where peak hour and daily automobile trip generation rates are far lower than those reported in Trip Generation, 8th Edition. In Warner Center and the Cities of Santa Monica and Pasadena, transportation management organizations (TMOs) created as public-private partnerships have also resulted in significant reductions in peak hour trips. PDF T-17 specifies that once 50% of the Project is developed, a TMO would be formed for the Project and the surrounding area residents and businesses, and would take over the implementation, operation, and expansion of the TDM program.

Revise Section 4.14.4.1 Transportation Mitigation Program in Section 4.14 Traffic as follows:

4.14.4.1 Transportation Mitigation Program

Transit System Improvements

The proposed Project would help to improve the transit system in the Study Area and beyond by providing additional buses along a key existing bus route ~~and by dedicating space on the Project site for a potential future transit station~~.

Buses

In order to bolster transit capacity and LOS in the Study Area, the proposed Project proposes to mitigate impacts along Manchester Boulevard by providing two additional transit buses for Metro Route 115. Each bus provides a seated capacity of 40 people and a standing capacity of 50 people and will supplement the existing bus service along Manchester Boulevard during peak

hours. **Figure 4.14-6,** Intersections along Enhanced Bus Routes shows the intersections along these routes where traffic volumes would be reduced as a result of the enhanced bus service available.

~~Dedicated Space for Future Transit Station~~

~~LAWA would work with Metro and LADOT during project design to identify a suitable location on the Project site which will be dedicated for potential future development of a transit station.~~

Revise Table 4.14-14 in Section 4.14 Traffic as follows:

Table 4.14-14

Existing with Project With Mitigation (Year 2012) Intersection Peak Hour Level of Service

No.	City	Intersection	Peak Hour	V/C	LOS
28.	LA	Sepulveda Boulevard & Manchester Avenue	A.M.	~~0.640~~ 0.641	B
			P.M.	~~0.757~~ 0.758	C
39.	LA	La Tijera Boulevard & Manchester Avenue	A.M.	~~0.506~~ 0.507	A
			P.M.	~~0.582~~ 0.584	A
46.	LA	Airport Boulevard & Manchester Avenue	A.M.	~~0.598~~ 0.599	A
			P.M.	~~0.799~~ 0.801	~~C~~D
47.	IW	Aviation Boulevard / Florence Avenue & Manchester Avenue	A.M.	~~0.635~~ 0.637	B
			P.M.	~~0.703~~ 0.705	C
49.	IW	La Cienega Boulevard & Manchester Avenue	A.M.	~~0.583~~ 0.584	A
			P.M.	~~0.829~~ 0.830	D
50.	IW	Ash Avenue / I-405 Northbound Ramps & Manchester Avenue	A.M.	~~0.630~~ 0.631	B
			P.M.	~~0.713~~ 0.715	C
51.	IW	Inglewood Avenue & Manchester Avenue	A.M.	~~0.475~~ 0.477	A
			P.M.	~~0.600~~	~~A~~B

Table 4.14-14

Existing with Project With Mitigation (Year 2012) Intersection Peak Hour Level of Service

No.	City	Intersection	Peak Hour	V/C	LOS
				0.601	
91.	LA	Falmouth Avenue & Manchester Avenue	A.M.	~~0.126~~ 0.134	A
			P.M.	~~0.114~~ 0.122	A
96.	LA	Emerson Avenue & Manchester Avenue	A.M.	~~0.481~~ 0.482	A
			P.M.	~~0.404~~ 0.405	A

Revise Table 4.14-15 in Section 4.14 Traffic as follows:

Table 4.14-15

Future With Project With Mitigation (Year 2022) Intersection Peak Hour Level of Service

No.	City	Intersection	Peak Hour	V/C	LOS
12.	Los Angeles	Lincoln Boulevard & Manchester Avenue	A.M.	0.606	B
			P.M.	~~0.723~~ 0.724	C
28.	Los Angeles	Sepulveda Boulevard & Manchester Avenue	A.M.	~~0.658~~ 0.659	B
			P.M.	~~0.803~~ 0.805	D
39.	Los Angeles	La Tijera Boulevard & Manchester Avenue	A.M.	~~0.565~~ 0.567	A
			P.M.	~~0.621~~ 0.622	B
46.	Los Angeles	Airport Boulevard & Manchester Avenue	A.M.	~~0.666~~ 0.667	B
			P.M.	~~0.906~~ 0.907	E
47.	Inglewood	Aviation Boulevard / Florence Avenue & Manchester Avenue	A.M.	~~0.711~~ 0.713	C
			P.M.	~~0.854~~ 0.855	D
49.	Inglewood	La Cienega Boulevard & Manchester Avenue	A.M.	~~0.684~~ 0.685	B
			P.M.	~~0.913~~ 0.914	E
50.	Inglewood	Ash Avenue / I-405 Northbound Ramps & Manchester Avenue	A.M.	~~0.683~~ 0.684	B
			P.M.	~~0.777~~ 0.778	C
51.	Inglewood	Inglewood Avenue & Manchester Avenue	A.M.	~~0.551~~ 0.552	A
			P.M.	~~0.682~~ 0.683	B
91.	Los Angeles	Falmouth Avenue &	A.M.	~~0.147~~	A

Table 4.14-15

Future With Project With Mitigation (Year 2022) Intersection Peak Hour Level of Service

No.	City	Intersection	Peak Hour	V/C	LOS
		Manchester Avenue	P.M.	0.155 ~~0.134~~ 0.142	A
96.	Los Angeles	Emerson Avenue &	A.M.	~~0.533~~ 0.534	A
		Manchester Avenue	P.M.	~~0.450~~ 0.451	A

Revise Section 4.15.3.3 LAX Master Plan Commitments and Project Design Features of Section 4.15 Utilities/Services as follows:

Project Design Features

Energy Use

The proposed LAX Northside Design Guidelines and Standards will require the proposed Project to incorporate techniques to reduce energy consumption, which will reduce energy impacts from the proposed Project.

- **PDF U-~~19~~18:** Roofs of all buildings are required to be painted a light color, preferably white.
- **PDF U-~~20~~19:** Energy efficient lighting is required.

Revise Section 4.15.4.2.1 Water Supply under Cumulative Impacts in Section 4.15 Utilities/Services as follows:

4.15.4.2.1 Water Supply

Section 3.0, Environmental Setting, identifies ~~34~~ 35 related projects anticipated to be developed within the City of Los Angeles. The estimated water demand of the related projects is shown in **Table 4.15-17**. As shown, the related projects would have an average daily water demand of approximately ~~1,901,060~~ 2,599,310 gpd, or ~~2,130.92~~ 2,913.59 AF annually. Therefore, the proposed Project in conjunction with the ~~34~~ 35 related projects would yield a total average daily water demand of approximately ~~2,453,982~~ 3,152,232 gpd, or ~~2,750.69~~ 3,533.37 AF annually. As previously stated, LADWP's 2010 UWMP projected that water demand within the LADWP service area would reach approximately 626,732 AF annually by 2022. Thus, the total annual cumulative water demand of approximately ~~2,750.69~~ 3,533.37 AF associated with the proposed Project and the related projects would fall within the available and projected water demand of the LADWP's 2010 UWMP. Therefore, cumulative impacts on water supply would be less than significant.

Revise Table 4.15-17 in Section 4.15 Utilities/Services as follows:

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Table 4.15-17

Related Projects Water Demand

ID	Related Project	Address	City	Residential	Residential Demand	Restaurant	Restaurant Demand	Retail	Retail Demand	Office	Office Demand	Other	Other Demand	School	School Demand	Total Demand (gpd)	Total Demand (AFY)
Factor[a]					**200**		**0.2**		**0.8**		**0.15**		**0.8**		**8**		**892.1325914**
Units					**gpd/unit**		**gpd/sf**		**gpd/sf**		**gpd/sf**		**gpd/sf**		**gpd/ student**	**gpd**	**AFY**
105	Village at Playa Vista	Playa Vista	Los Angeles	2,600	520,000			150,000	120,000	175,000	26,250	40,000	32,000			698,250	
															Related Projects Total	2,599,310 ~~1,901,060~~	2,913.59 ~~2,130.92~~

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Revise Table 4.15-15 in Section 4.15 Utilities/Services as follows:

Table 4.15-15

Estimated Electricity Usage of the Proposed Project

Note:

kWh = kilowatt hours
Source: ~~City of Los Angeles, Department of Public Works, Bureau of Sanitation, 2006~~ California Energy Demand 2010-202 Adopted Forecast, Chapter 6: Los Angeles Department of Water and Power Planning Area, Form 1.1 – Electricity Consumption by Sector, page 209

Revise Table 4.15-15 in Section 4.15 Utilities/Services as follows:

Table 4.15-16

Estimated Natural Gas Usage of the Proposed Project

Source: ~~City of Los Angeles, Department of Public Works, Bureau of Sanitation, 2006~~ California Energy Commission, Energy Consumption Data Management System (ECDMS), 2014

Revise Section 4.15.4.4.1 Electricity under Cumulative Impacts in Section 4.15 Utilities/Services as follows:

4.15.4.4.1 Electricity

As previously analyzed, LADWP forecasts that by 2022, electricity consumption within its service area would increase to 28,333 GWh per year. Future 2022 cumulative growth within LADWP's service area is accounted for in this forecast. Thus, the proposed Project related annual electricity consumption of approximately 35 GWh would represent approximately 0.12 percent of the forecasted cumulative energy consumption in 2022. Based on this small percentage, the proposed Project's contribution to the cumulative electricity demand would not be substantial. The annual electricity demand attributable to the related projects in LADWP's service area identified in Section 3.0, Environmental Setting, of this Draft EIR is shown in **Table 4.15-18**. Three related projects do not currently have known square footages and are therefore excluded from the analysis as insufficient information exists to calculate electricity usage. Sixteen of the related projects would remove existing uses that currently consume electricity. The cumulative analysis considers gross new uses and does not exclude current uses that would be removed, presenting a conservative analysis. As indicated, these related projects would result in an estimated electricity demand of ~~9,384,914~~ 24,018 MWh per year, or approximately ~~9,385~~ 24.02 GWh per year. Therefore, the electricity demand attributable to these related projects is within LADWP's 2022 electricity demand forecasts. Additionally, these related projects and other future development projects through 2022 would be subject to Title 24, the

CalGreen Code, which are updated periodically to incorporate new technologies and methods that achieve greater energy efficiency. Thus, cumulative impacts on electricity would be less than significant.

Revise Table 4.15-18 in Section 4.15 Utilities/Services as follows:

Table 4.15-18

Related Projects Electricity Usage

ID	Related Project	Address	City	Land Use Type	Development Proposed (ksf or unit)	Factor (kWh/sf or unit/year)[a]	Electricity Usage (~~M~~kWh)
105	Village at Playa Vista	Playa Vista	Los Angeles	Residential	2,600	5626.5	14,628.900,000
				Retail	150.000	13.55	2,032.500
				Office	175.000	12.95	2,266.250
				Community Serving	40.000	12.95	420.000
				Total Related Projects Electricity Demand (~~M~~kWh)			**24,018,533.23** **~~9,384,914.481~~**

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Revise Section 4.15.4.4.2 Natural Gas under Cumulative Impacts in Section 4.15 Utilities/Services as follows:

4.15.4.4.2 Natural Gas

The annual natural gas demand attributable to the 115 ~~104~~ related projects in the Gas Company's service area identified in Section 3.0, Environmental Setting, of this Draft EIR is shown in **Table 4.15-19**. ~~Eight~~ Nine related projects do not currently have known square footages and are therefore excluded from the analysis as insufficient information exists to calculate natural gas usage. ~~Twenty-nine~~ Thirty of the related projects would remove existing uses that currently consume natural gas. The cumulative analysis considers gross new uses and does not exclude current uses that would be removed, presenting a conservative analysis. As indicated, these related projects would result in an estimated natural gas demand of 27,195,056 cf per month, or 326 million cubic feet per year ~~12,789,816 kscf per year~~. Therefore, the natural gas demand attributable to these related projects is within The Gas Company's 2020 natural gas demand forecasts. Additionally, these related projects and other future development projects through 2022 would be subject to Title 24, CalGreen Code, which are updated periodically to incorporate new technologies and methods that achieve greater energy efficiency. Thus, cumulative impacts on natural gas would be less than significant.

Revise Table 4.15-19 in Section 4.15 Utilities/Services as follows:

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Table 4.15-19

Related Projects Natural Gas Usage

ID	Related Project	Address	City	Land Use Type	Development Proposed (ksf or unit)	Factor (cf/sf or unit/month)[a]	Natural Gas Usage (cf)
105	Village at Playa Vista	Playa Vista	Los Angeles	Residential	2,600	4,011.50	10,429,900.000
				Retail	150.000	2.90	435.000
				Office	175.000	2.00	350.000
				Community Serving	40.000	2.00	80.000
106	Sony Pictures Studios Comprehensive Plan	10202 West Washington Boulevard	Culver City	Office	218.450	2.00	436.900
				Office (production support)	51.716	2.00	103.432
107	Washington/Landmark	8810 Washington Boulevard	Culver City	Office	38.732	2.00	77.464
				Retail	41.745	2.90	121.061
108	Legado Mixed Use TOD	8770 Washington Boulevard	Culver City	Residential	115.000	4,011.50	461,322.500
				Retail	31.240	2.90	90.596
109	Office and Retail Building	700 Corporate Pointe	Culver City	Office	240.612	2.00	481.224
				Retail	4.242	2.90	12.302

110	Parcel B	9300 Culver Boulevard	Culver City	Office	74.600	2.00	149.200
				Restaurant	21.700	4.80	104.160
				Retail	21.700	2.90	62.930
111	Triangle Site-Washington/National TOD	NW Corner of Washington and National	Culver City	Residential	290.000	4,011.50	1,163,335.000
				Hotel	59.600	4.80	286.080
				Office	200.000	2.00	400.000
				Retail	51.500	2.90	149.350
				Restaurant	20.000	4.80	96.000
112	West Los Angeles College Master Plan	9000 Overland Ave.	Culver City	Office	43.280	2.00	86.560
				School/Educational	94.280	2.00	188.560
113	Culver Studios Amendment No. 6	9336 Washington Boulevard	Culver City	Office	110.968	2.00	221.936
114	Marina del Rey Visioning	Marina del Rey	Marina del Rey, Unincorporated Los Angeles County	Retail, open space, residential, hotel	N/A	N/A	-
115	AMLI Residential Development	Marina del Rey, Parcel 15	Marina del Rey, Unincorporated Los Angeles County	Commercial	8.000	2.9	23.200
				Residential	585.000	4,011.50	2,346,727.500
Total Related Projects Natural Gas Demand (cf)							**~~12,789,816~~ 27,195,056**

Chapter 6.0, Alternatives

Revise subsection CMP Freeway Analysis in Section 6.8.2.14 Traffic and Transportation in Section 6.0 Alternatives as follows:

6.8.2.14 Traffic and Transportation

CMP Freeway Analysis

Alternative 2 would add 150 or more peak hour trips to four of the freeway monitoring locations in either direction. The freeway monitoring locations would be impacted as follows under Alternative 2: none of the freeway monitoring locations would be impacted by Alternative 2 traffic under Existing conditions, and one freeway monitoring location would be impacted by Alternative 2 traffic under Future conditions, before and after mitigation, during the morning peak hour. ~~one monitoring location under both Existing and Future conditions before and after mitigation during the afternoon peak hour; one monitoring location under Future conditions before and after mitigation during the morning peak hour; and one monitoring location under Future conditions before and after mitigation during the afternoon peak hour.~~ The proposed Project's CMP freeway impacts would be greater under Alternative 2 compared to no impacts under the Project.

Revise subsection CMP Freeway Analysis in Section 6.10.2.14 Traffic and Transportation in Section 6.0 Alternatives as follows:

6.10.2.14 Traffic and Transportation

CMP Freeway Analysis

Alternative 4 would add 150 or more peak hour trips to two of the freeway monitoring locations in either direction. ~~One of the freeway monitoring locations (I-105 East of Sepulveda Boulevard) would be impacted by Alternative 4 traffic under both Existing and Future conditions, before and after mitigation. This is a greater impact than projected under Project conditions.~~ None of the freeway monitoring locations would be impacted by Alternative 4 traffic under Existing or Future conditions. This is the same as under Project conditions.

Revise Table 6-23 in Section 6.12 Environmentally Superior Alternative in Section 6.0 Alternatives as follows:

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Table 6-23

Comparison of Impacts Associated with the Proposed Project and Impacts of Alternatives

Environmental Issue	Project Impact	Alternative 1 No Project-Existing Conditions	Alternative 2 No Project-Planned Development	Alternative 3 Reduced ~~Retail~~ Density	Alternative 4 Reduced ~~Density~~ Retail	Alternative 5 Cargo
CMP Freeway Analysis- Existing with Alternative (2012 Conditions)	Less than Significant Impact	No Impact	~~Significant Impact~~ ~~1 location~~ Less than Significant Impact	No Impact	~~Significant Impact~~ ~~1 location~~ Less than Significant Impact	Less than Significant Impact
CMP Freeway Analysis- Future with Alternative (2022 Conditions)	Less than Significant Impact	No Impact	Significant Impact ~~3 locations~~ 1 location	No Impact	~~Significant Impact~~ ~~1 location~~ Less than Significant Impact	Less than Significant Impact

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3.3 Corrections and Additions to the Draft EIR Appendices Text

Revise Section 1.2.1 LAX Master Plan Commitments of Appendix C1 Air Quality Technical Report as follows:

1.2.1 LAX Master Plan Commitments

~~***Construction related mitigation measures quantified in these analyses:***~~

- ~~Watering (per SCAQMD Rule 403) - three times daily.~~
- ~~On-road trucks used on LAX construction projects with a gross vehicle weight rating of at least 19,500 pounds shall be 2010 model year or newer thereby complying with USEPA 2010 on-road emission standards for Particulate Matter less than 10 microns in diameter (PM_{10}) and Oxides of nitrogen (NO_x)[3].~~
- ~~Ultra-low sulfur diesel fuel will be used in construction equipment.~~
- ~~All diesel-fueled equipment used for construction will be outfitted with the best available emission control devices, where technologically feasible, primarily to reduce emissions of diesel particulate matter (PM), including fine PM ($PM_{2.5}$), and secondarily, to reduce emissions of NO_x. This requirement shall apply to diesel-fueled off-road equipment (such as construction machinery), diesel-fueled on-road vehicles (such as trucks), and stationary diesel-fueled engines (such as electric generators). (It is unlikely that this measure will apply to equipment with Tier 4 engines.) The emission control devices utilized in construction equipment shall be verified or certified by California Air Resources Board or United States Environmental Protection Agency for use in on-road or off-road vehicles or engines. For multi-year construction projects, a reassessment shall be conducted annually to determine what constitutes a best available emissions control device.~~
- ~~Prior to January 1, 2015, all off-road diesel-powered construction equipment greater than 50 horsepower shall meet USEPA Tier 3 off-road emission standards. After December 31, 2014, all off-road diesel-power construction equipment greater than 50 horsepower shall meet USEPA Tier 4 off-road emissions standards. Tier 4 equipment shall be considered based on availability at the time the construction bid is issued. LAWA will encourage construction contractors to apply for SCAQMD "SOON" funds to accelerate clean-up of off-road diesel engine emissions.~~

[3] While the mitigation measure commits to using trucks that meet the USEPA 2010 standards for on-road heavy-duty trucks, the analysis conservatively assumes the use of trucks that meet the 2007 standards for on-road heavy-duty trucks.

Operations related mitigation measures that are required of all LAWA projects but were conservatively not quantified in the analyses of the proposed Project:

- ~~Require the use of electric lawn mowers and leaf blowers, as these units become available for commercial use, for landscape maintenance associated with the proposed project.~~

Revise Section 1.2.2 Project Design Features of Appendix C1 Air Quality Technical Report as follows:

1.2.2 Project Design Features

The proposed Project includes the following project design features that reduce potential air quality emissions. ~~These project design features are quantified in this analysis.~~

Construction related project design features quantified in these analyses:

- Watering (per SCAQMD Rule 403) three times daily to reduce fugitive dust emissions.
- On-road trucks used on LAX construction projects with a gross vehicle weight rating of at least 19,500 pounds shall, at a minimum, comply with USEPA 2010 on-road emission standards for Particulate Matter less than 10 microns in diameter (PM_{10}) and Oxides of nitrogen (NO_x)[4]. Contractor requirements to utilize such on-road haul trucks or the next cleanest vehicle available will be subject to the provisions of LAWA Air Quality Control Measure 2"x" (part of LAX Master Plan Commitment LAX-AQ-2, LAX Master Plan – Mitigation Plan for Air Quality; Construction-Related Measures).
- All off-road diesel-powered construction equipment greater than 50 horsepower shall meet, at a minimum, US EPA Tier 3 off-road emission standards. In addition, all off-road diesel powered construction equipment greater than 50 hp with engines meeting USEPA Tier 3 off-road emission standards shall be retrofitted with a CARB-verified Level 3 Diesel Emissions Control Strategies (DECS). Any emissions control device used by the Contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. Wherever feasible, all off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards. In the event the Contractor is using off-road diesel-powered construction equipment with engines meeting the Tier 4 off-road emission standards and is already supplied with a factory-equipped diesels particulate filter, no retrofitting with DECS is required. Contractor requirements to utilize Tier 3 equipment or next cleanest equipment available will be subject to the provisions of LAWA Air Quality Control Measure 2"x" (part of LAX Master Plan Commitment LAX-AQ-2, LAX Master Plan – Mitigation Plan for Air Quality; Construction-Related Measures). LAWA will encourage construction contractors to apply for SCAQMD "SOON" funds to accelerate clean-up of off-road diesel engine emissions.

Construction related project design features not quantified in these analyses:

- LAWA will provide informational materials regarding building materials that do not require painting.

[4] While the mitigation measure commits to using trucks that meet the USEPA 2010 standards for on-road heavy-duty trucks, the analysis conservatively assumes the use of trucks that meet the 2007 standards for on-road heavy-duty trucks.

Operation related project design features quantified in these analyses:

- Implementation of a Transportation Demand Management (TDM) program[5] for the Project Site to promote non-auto travel. This measure is incorporated into the analyses by applying a 5% trip reduction to office, and research and development land uses on Project site.
- Capping the maximum number of trips generated by the LAX Northside at ~~23,636~~ 23,635 total daily vehicle trips.
- Compliance with Section A5.203.1.1 of the 2010 California Green Building Standard Code Tier 1[6]. Exceed the 2008 energy efficiency standards defined in the California Energy Code Title-24 Part 6 by 15%.

Operation related project design features that are conservatively not quantified in this analysis:

- Provide a minimum number of electric vehicle charging stations, which is equal to 5% of the total number of parking spaces.
- Provide necessary infrastructure (wiring and plugs) at appropriate locations on the proposed Project site that can be used for electric landscaping equipment.

Replace Figure 6 of Appendix C1 Air Quality Technical Report with the following revised figure:

[5] Gibson Transportation Consulting Inc., September 2012. Transportation Study for the LAX Northside Plan Update.

[6] California Building Standards Commission, "*California 2010 Green Building Standards, CALGreen, California Code of Regulations Title 24, Part 11*", June 2010.

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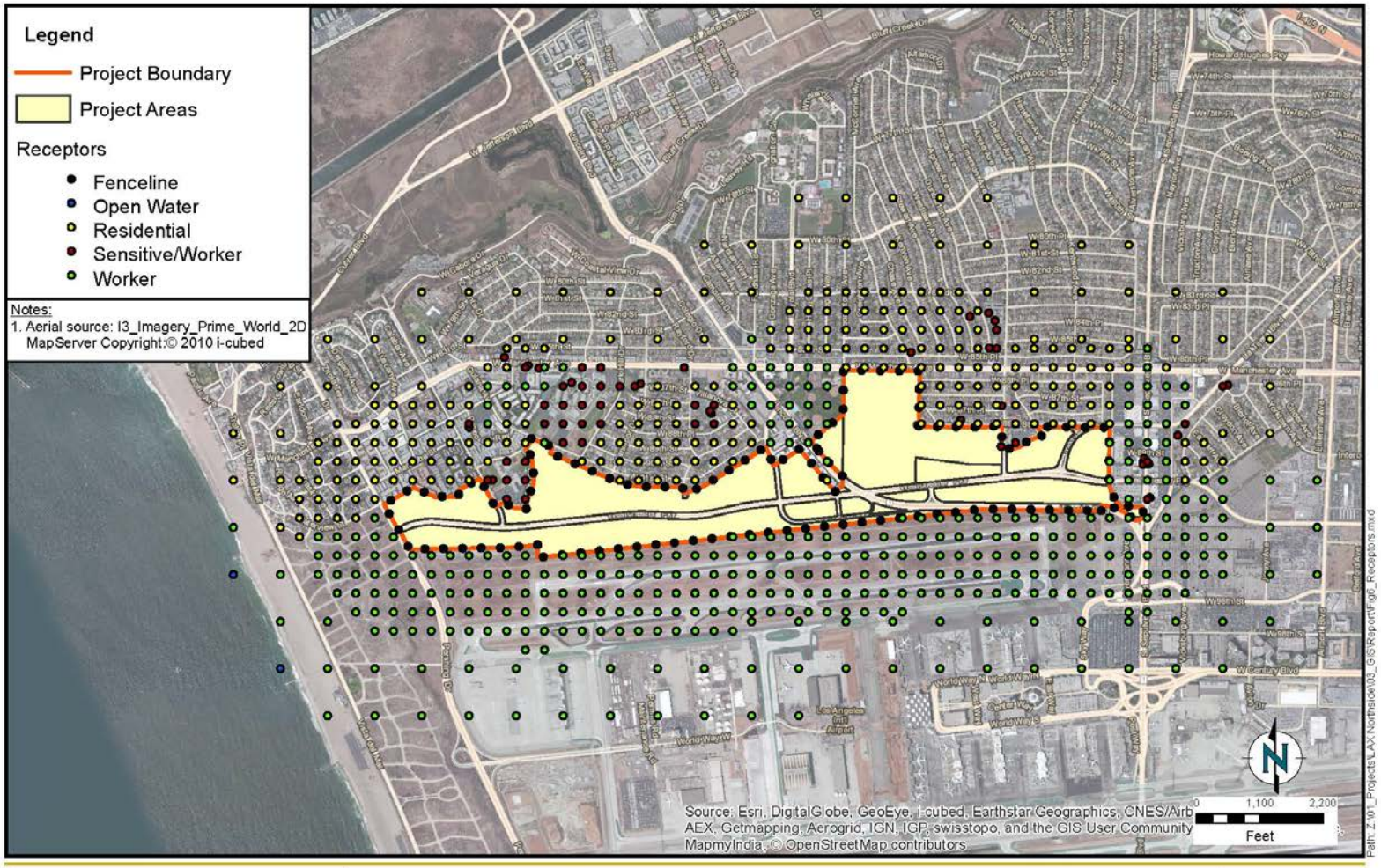

ENVIRON

Location of Modeling Receptors

LAX Nothside Project

Figure 6

DRAFTED BY: VJ | Date: 10/30/2014 | PROJECT: 05-25798B

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Revise Table 20 of Appendix C1 Air Quality Technical Report as follows:

Table 20. Health Risk Assessment from Construction and Operational Activities

Health Endpoint	Receptor	Maximum Estimated Incremental Risk [1] (Risk in 1 million)	SCAQMD Threshold (Risk in 1 million)
Cancer Risk	Resident	1.1	10
	Worker	~~1.5~~ 1.3	10
	Sensitive	0.8	10
Health Endpoint	**Receptor**	**Maximum Estimated Hazard Index [1]**	**SCAQMD Threshold**
Chronic Noncancer Hazard Index	Resident	0.007	1.0
	Worker	~~0.007~~ 0.005	1.0
	Sensitive	0.005	1.0
Acute Noncancer Hazard Index	Resident	0.001	1.0
	Worker	0.001	1.0
	Sensitive	0.001	1.0
	Other[2]	0.001	1.0

Notes:

[1] Based on emissions from LAX Northside and Westchester Stormwater BMP. Note, Westchester Stormwater BMP is a related project that will be analyzed and approved separate from the LAX Northside Project; however, it is included for purposes of the air quality analysis to provide a more conservative estimate of potential impacts.

[2] "Other" refers to receptors located on the Project fenceline and over open water.

Abbreviations:

BMP - Best Management Practices

SCAQMD - South Coast Air Quality Management District

Revise tables H.6-1, H.6-2, H.9.1, H.9-2, H.10-1, and H.10-2 of Appendix H of Appendix C1 Air Quality Technical Report as shown in Appendix C Revised Air Quality Technical Report Tables of this Final EIR.

Revise Section 1.2.1 LAX Master Plan Commitments of Appendix C2 Greenhouse Gas Technical Report as follows:

1.2.1 LAX Master Plan Commitments

~~The following construction related mitigation measures were quantified in these analyses~~

- ~~Prior to January 1, 2015, all off-road diesel-powered construction equipment greater than 50 horsepower shall meet USEPA Tier 3 off-road emission standards. After December 31, 2014, all off-road diesel-power construction equipment greater than 50 horsepower shall meet USEPA Tier 4 off-road emissions standards. Tier 4 equipment shall be considered based on availability at the time the construction bid is issued. LAWA will encourage construction contractors to apply for SCAQMD "SOON" funds to accelerate cleanup of off-road diesel engine emissions[7].~~

Operation related mitigation measures that are required for LAWA projects, but were conservatively not quantified in this analysis for the proposed Project:

[7] From LAX Specific Plan Amendment Study Measure MM-AQ (SPAS)-1.

- ~~Require the use of electric lawn mowers and leaf blowers, as these units become available for commercial use, for landscape maintenance associated with the proposed Project[8].~~

Revise Section 1.2.2 Project Design Features of Appendix C2 Greenhouse Gas Technical Report as follows:

1.2.2 Project Design Features

Construction related project design features quantified in this analysis:

- All off-road diesel-powered construction equipment greater than 50 horsepower shall meet, at a minimum, US EPA Tier 3 off-road emission standards. In addition, all off-road diesel powered construction equipment greater than 50 hp with engines meeting USEPA Tier 3 off-road emission standards shall be retrofitted with a CARB-verified Level 3 Diesel Emissions Control Strategies (DECS). Any emissions control device used by the Contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. Wherever feasible, all off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards. In the event the Contractor is using off-road diesel-powered construction equipment with engines meeting the Tier 4 off-road emission standards and is already supplied with a factory-equipped diesels particulate filter, no retrofitting with DECS is required. Contractor requirements to utilize Tier 3 equipment or next cleanest equipment available will be subject to the provisions of LAWA Air Quality Control Measure 2"x" (part of LAX Master Plan Commitment LAX-AQ-2, LAX Master Plan – Mitigation Plan for Air Quality; Construction-Related Measures). LAWA will encourage construction contractors to apply for SCAQMD "SOON" funds to accelerate clean-up of off-road diesel engine emissions.

Operation related project design features that are not quantified in this analysis:

- Provide a minimum number of electric vehicle charging stations, which is equal to 5% of the total number of parking spaces.
- Provide necessary infrastructure (wiring and plugs) at appropriate locations on the proposed Project site that can be used for electric landscaping equipment.

[8] From LAX Specific Plan Amendment Study Measure MM-AQ (SPAS)-3.

Revise the Existing Conditions section of the Executive Summary of Appendix E Traffic Study as follows:

EXISTING CONDITIONS

An analysis of existing frequency and ridership was conducted on the transit lines within walking distance of the Project Site. It is estimated that the transit lines serving the Project Site have combined residual capacity of at least ~~1,113~~2,347 transit patrons during the morning peak hour and ~~2,492~~2,416 transit patrons during the afternoon peak hour.

Revise the Transportation Mitigation Program section of the Executive Summary of Appendix E Traffic Study as follows:

TRANSPORTATION MITIGATION PROGRAM

The TDM program would implement a number of programs for employers and employees including education and awareness programs promoting TDM programs, project design features to promote bicycling and walking, ridesharing services and transportation assurance programs, and incentives for using alternative modes of travel. In total, it is expected that the TDM program would reduce trip generation for the office and R&D uses at the Project Site by ~~10%~~5%. Additionally, when 55% of the Project has been completed, an areawide transportation management organization (TMO) would be formed voluntarily by the Project Applicant to open the benefits of the TDM program to the residents and businesses in the community.

Revise the Transportation Mitigation Program section of the Executive Summary of Appendix E Traffic Study as follows:

TRANSPORTATION MITIGATION PROGRAM

The Project proposes to mitigate impacts along Manchester Boulevard by providing additional transit buses on an existing transit line. Two buses would be provided to increase service capacity and frequency for Metro Route 115, which travels east and west on Manchester Boulevard. Each bus provides a standing capacity of 50 people and will supplement the existing bus service along the Lincoln and Manchester corridors during peak hours. A total credit of up to ~~66~~58 trips (~~33~~29 in each direction) was applied to the intersections along Metro Route 115. Additionally, the Applicant would work with Metro and LADOT during Project design to identify a suitable location on the Project Site which will be dedicated for potential future development of a transit station. No additional transit or trip credit was assumed for this design feature.

Add the Additional Condition of Approval (Project Design Feature) section to the Executive Summary of Appendix E Traffic Study as follows:

ADDITIONAL CONDITION OF APPROVAL (PROJECT DESIGN FEATURE)

In addition to the mitigation measures described above, an improvement to Intersection #86 (Jefferson Boulevard & Sepulveda Boulevard & Play Street) would be required as a condition of approval and included as a Project Design Feature after discussion with Culver City staff. This improvement would consist of adding a third eastbound left-turn lane, along with associated signage and traffic signal improvements. After implementation of the improvement, this

intersection would provide two left-turn lanes, one shared left-turn/through lane, and one shared through/right-turn lane in the eastbound direction. For more information about this improvement, please refer to Appendix C.

Revise the Existing Transit Ridership subsection of Chapter 2 Existing Conditions of Appendix E Traffic Study as follows:

Existing Transit Ridership

Table 7 summarizes the average load for each line as well as the capacity of each run. It also shows the average residual transit capacity for each run and total residual capacity during the peak periods. As indicated in Table 7, all lines for which data was available have residual capacity during the morning and afternoon peak periods. In total, the transit system has residual capacity of at least ~~1,113~~2,347 riders during the morning peak period and ~~2,492~~2,416 riders during the afternoon peak period. Additional residual capacity is likely available on the bus lines from ~~Torrance Transit~~ Culver City Bus and Beach Cities Transit, but since data was not available for these services they were assumed not to have additional capacity.

Revise the Future without Project Conditions as Measured Against Future Without Project Conditions (Year 2022) section of Chapter 7 Intersection Impact Analysis of Appendix E Traffic Study as follows:

FUTURE WITH PROJECT CONDITIONS AS MEASURED AGAINST FUTURE WITHOUT PROJECT CONDITIONS (YEAR 2022)

Additionally, a supplemental analysis of intersections within Culver City was conducted at Culver City staff's request measuring Project traffic against an alternative set of thresholds based on City of Los Angeles impact criteria. Project traffic would exceed these thresholds at Intersection #86, Sepulveda Boulevard & Jefferson Boulevard & Playa Street. The analysis of Culver City intersections using Los Angeles impact criteria is summarized in more detail in Appendix C.

Revise Chapter 8 Transportation Mitigation and Improvements Program of Appendix E Traffic Study as follows:

Chapter 8

Transportation Mitigation and Improvements Program

The various mitigation measures and improvements described in this Chapter were tested against the significant traffic impacts found in both the Existing with Project (year 2012) and the Future with Project (year 2022) analyses presented in Chapter 7. As described in that Chapter, the Existing with Project conditions, before mitigation, are expected to generate significant traffic impacts at ~~12~~ 11 intersections during either the morning or afternoon peak hours. The Future with Project conditions, before mitigation, are expected to generate significant traffic impacts at ~~19~~ 18 intersections during either the morning or afternoon peak hours.

The mitigation program for the Project includes the following major components:

1. Implementation of a transportation demand management (TDM) program for the Project Site to promote peak period trip reduction;

1. Transportation Systems Management (TSM) improvements consisting primarily of right-turn detector systems at key intersections within the Study Area. TSM improvements may also include installation of detection loops, signal controller upgrades, and closed circuit television (CCTV) cameras ;

2. Transit system improvements, including the provision of new buses to increase public transit service along a key corridor within the Study Area and the dedication of space for a potential future transit station on the Project Site; and,

3. Specific intersection improvements.

Additionally, as described at the end of this chapter, an improvement to Intersection #86, Jefferson Boulevard & Sepulveda Boulevard & Playa Street, would be required as a condition of approval and is included as a Project Design Feature.

Revise the Project Trip Reduction from TDM Program subsection of the Transportation Demand Management Program section of Chapter 8 Transportation Mitigation and Improvements Program of Appendix E Traffic Study as follows:

Project Trip Reduction from TDM Program

Compared with total Project trip generation before the implementation of the TDM program, the TDM program represents a reduction of 2.2% of daily trips, 3.8% of morning peak hour trips, and 2.7% of afternoon peak hour trips. These represent reasonable and conservative estimates of potential peak hour trip generation reduction. TDM programs in office buildings have been shown to be highly effective in Century City, where peak hour and daily automobile trip generation rates are far lower than those reported in *Trip Generation, 8th Edition*. In Warner Center and the Cities of Santa Monica and Pasadena, transportation management organizations (TMOs) created as public-private partnerships have also resulted in significant reductions in peak hour trips. As a voluntary measure, once 55% of the Project is developed, the Project Applicant will form a TMO for the Project and the surrounding area residents and businesses. This TMO would take over the implementation, operation, and expansion of the TDM program once it is implemented.

Revise the Provision of Additional Buses subsection of the Transit system Improvements section of Chapter 8 Transportation Mitigation Program of Appendix E Traffic Study as follows:

Provision of Additional Buses

Using the seated capacity of 40 people and assuming average vehicle occupancy of ~~1.2~~1.4 people per vehicle, each 40-foot bus has the capacity to remove ~~33~~29 vehicles from the road during the peak hour. To account for additional transit capacity along the affected route, a credit of up to ~~33~~29 trips has been applied to the intersections along the route the buses would travel. One bus would be added in each direction during the peak periods. As a result, a total credit of

up to ~~66~~58 trips (~~33~~29 in each direction) was applied to the intersections traversed by Metro Route 115. (For conservative purposes, and in order to account for decreased ridership at the terminus of a transit line, a reduced credit of ~~10~~9 trips in each direction was applied to the westernmost intersections along Metro Route 115, beginning at the intersection of Lincoln Boulevard & Manchester Avenue.)

Revise the Summary of Intersection Impacts After Mitigation section of Chapter 8 Transportation Mitigation Program of Appendix E Traffic Study as follows:

SUMMARY OF INTERSECTION IMPACTS AFTER MITIGATION

ADDITIONAL CONDITION OF APPROVAL(PROJECT DESIGN FEATURE)

As described in Appendix C, Culver City staff requested that an alternative set of Project trip thresholds based on City of Los Angeles impact criteria be tested at all Culver City intersections. Project traffic would exceed these thresholds under Future with Project Conditions at Intersection #86 (Jefferson Boulevard & Sepulveda Boulevard & Play Street). At the request of Culver City staff, an additional condition of approval would be required of the Project to improve this intersection. This improvement would consist of adding a third eastbound left-turn lane, along with associated signage and traffic signal improvements. After implementation of the improvement, this intersection would provide two left-turn lanes, one shared left-turn/through lane, and one shared through/right-turn lane in the eastbound direction. This improvement would be implemented upon completion of 55% of the Project, or 1,400 afternoon peak hour trips. After implementation of the improvement, Project traffic would not result in exceeding the threshold identified by Culver City at this intersection, as shown in Appendix C. For the complete details of this analysis, please refer to Appendix C.

Revise the Regional Transit System Impacts subsection of the Regional Transit System Impact Analysis section of Chapter 9 Congestion Management Program Analysis of Appendix E Traffic Study as follows:

Regional Transit System Impacts

Load factors were calculated based on the average hourly load on each transit route and the average hourly capacity on that route (calculated from average headways) as described in Chapter 2. Assuming that the maximum load on the transit lines increases at 1% per year (a total of 10% through the year 2022, which is slightly higher than the level of vehicular traffic growth projected between years 2012 and 2022), the residual capacity on the transit system in 2022 without the Project is expected to be ~~2,107~~2,051 in the morning peak hour and ~~2,175~~2,111 in the afternoon peak hour. Therefore, the anticipated transit demand from the Project on a systemwide basis would be more than satisfied by the capacity surplus and the Project is not expected to significantly impact the regional transit system. Tables 27 and 28 summarize the assumptions, calculations, and results from the analysis. As shown in Table 28, even after completion of the proposed Project, the transit system is expected to have residual capacity of approximately ~~1,896~~1,840 person-trips during the morning peak hour and ~~1,908~~1,844 person-trips during the afternoon peak hour. This is a conservative estimate, as it does not include the capacity of proposed future transit service such as the Metro Crenshaw/LAX Transit Corridor.

Revise Tables 6, 7, 9, 18, 19, 20, 21, 27, and 28 of Appendix E Traffic Study as follows:

TABLE 6
EXISTING TRANSIT SERVICE SERVING STUDY AREA

Provider, Route, and Service Area			Service Type	Hours of Operation	Average Headway (minutes)			
					Morning		Afternoon	
					NB/EB	SB/WB	NB/EB	SB/WB
Metro Bus								
40		Downtown Los Angeles - LAX - South Bay - Galleria via King - La Tijera - Hawthorne	Local	24 - Hour	9	10	10	9
42		Downtown Los Angeles - LAX - South Bay - Galleria via King - La Tijera - Hawthorne	Local	5:30 A.M. - 8:30 P.M.	30	34	40	34
42A		Downtown Los Angeles - LAX - South Bay - Galleria via King - La Tijera - Hawthorne	Local	8:00 P.M. - 12:30 A.M.	N/A	N/A	N/A	N/A
102		Baldwin Village - South Gate via Coliseum Street	Local	5:30 A.M. - 9:00 P.M.	48	40	48	48
439		Downtown Los Angeles - Culver City Transit Center via I-10 Freeway	Express	5:00 A.M. - 7:00 P.M.	40	40	34	48
Municipal Area Express (MAX)								
MX2		Palos Verdes Peninsula	Express	6:30 A.M. - 5:30 P.M.	60	N/A	N/A	60
MX3		San Pedro / Torrance	Express	5:30 A.M. - 6:30 P.M.	30	N/A	N/A	30
MX3X		Freeway Express - San Pedro	Express	6:00 A.M. - 6:00 P.M.	30	N/A	N/A	45

TABLE 7
EXISTING TRANSIT SERVICE PATRONAGE AND RESIDUAL CAPACITY
LINES SERVING PROJECT PERIPHERY

Morning Peak Hour						
Provider and Route	**Number of Runs During Peak Hour** [a]	**Capacity** [b]	**Average Load** [c]	**Load Factor - Load/Capacity** [d]	**Residual Capacity per Run**	**Residual Capacity in Peak Hour** [e]
Metro Bus						
~~42~~ -	~~4~~	~~50~~	~~33~~	~~0.66~~	~~17~~	~~68~~
					Total Residual Capacity in Peak Hour	**~~2,415~~ 2,347**

Afternoon Peak Hour						
Provider and Route	**Number of Runs During Peak Hour** [a]	**Capacity** [b]	**Average Load** [c]	**Load Factor - Load/Capacity** [d]	**Residual Capacity per Run**	**Residual Capacity in Peak Hour** [e]
Metro Bus						
~~42~~	~~4~~	~~50~~	~~31~~	~~0.62~~	~~19~~	~~76~~
					Total Residual Capacity in Peak Hour	**~~2,492~~ 2,416**

TABLE 9
RELATED PROJECTS

No.	Project	Address	Project Description
Additional Related Projects Added to Final Environmental Impact Report			
105.	Village at Playa Vista	Playa Vista	(Los Angeles) 2,600 residential units, 175 ksf office, 150 ksf retail, 40 ksf community.
106.	Sony Pictures Studios Comprehensive Plan	10202 W Washington Blvd	(Culver City) 218.45 ksf office building and 51.716 ksf production support.
107.	Washington/Landmark	8810 Washington Blvd	(Culver City) 38.732 ksf office and 41.745 ksf retail and restaurant.
108.	Legado Mixed-Use TOD	8770 Washington Blvd	(Culver City) 115 residential units and 31.24 ksf retail.
109.	Office and Retail Building	700 Corporate Pointe	(Culver City) 240.612 ksf office and 4.242 ksf retail.
110.	Parcel B	9300 Culver Blvd	(Culver City) 71.6 ksf office, 21.7 ksf restaurant, and 21.7 ksf retail.
111.	Triangle Site - Washington/National TOD	NW Corner of Washington & National	(Culver City) 290 residential units, 149 hotel rooms, 200 ksf office, 51.5 ksf retail, and 20 ksf restaurant.
112.	West Los Angeles College Master Plan	9000 Overland Ave	(Culver City) 41.28 ksf technology center, 16 ksf sound stage, 43 ksf office, 24 ksf student annex, and 13 ksf performing arts center.
113.	Culver Studios Amendment No. 6	9336 Washington Blvd	(Culver City) Phase 1: 25.093 ksf office and 13.634 ksf support; Phase 2: 63.5 ksf office and 8.741 ksf support.
114.	Marina del Rey Visioning	Marina del Rey	Long-range vision plan for Marina del Rey (no land use plan as of yet).
115.	AMLI Residential Development on Via Marina	Marina del Rey, Parcel 15	585 residential units and 8,000 sf commercial.

TABLE 18
EXISTING WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2012)
INTERSECTION PEAK HOUR LEVELS OF SERVICE

No.	City	Intersection	Peak Hour	V/C	LOS
28.	LA	Sepulveda Boulevard & Manchester Avenue	A.M. P.M.	~~0.640~~ 0.649 ~~0.757~~ 0.766	B C
39.	LA	La Tijera Boulevard & Manchester Avenue	A.M. P.M.	~~0.506~~ 0.507 ~~0.582~~ 0.584	A A
46.	LA	Airport Boulevard & Manchester Avenue	A.M. P.M.	~~0.598~~ 0.599 ~~0.799~~ 0.801	A ~~C~~ D
47.	IW	Aviation Boulevard / Florence Avenue & Manchester Avenue	A.M. P.M.	~~0.635~~ 0.637 ~~0.703~~ 0.705	B C
49.	IW	La Cienega Boulevard & Manchester Avenue	A.M. P.M.	~~0.583~~ 0.584 ~~0.829~~ 0.830	A D
50.	IW	Ash Avenue / I-405 Northbound Ramps & Manchester Avenue	A.M. P.M.	~~0.630~~ 0.631 ~~0.713~~ 0.715	B C
51.	IW	Inglewood Avenue & Manchester Avenue	A.M. P.M.	~~0.475~~ 0.477 ~~0.600~~ 0.601	A ~~A~~ B
91.	LA	Falmouth Avenue & Manchester Avenue	A.M. P.M.	~~0.126~~ 0.134 ~~0.114~~ 0.122	A A
96.	LA	Emerson Avenue & Manchester Avenue	A.M. P.M.	~~0.481~~ 0.489 ~~0.404~~ 0.412	A A

TABLE 18 (continued)
EXISTING WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2012)
INTERSECTION PEAK HOUR LEVELS OF SERVICE SUMMARY

Level of Service	Number of Intersections	
	Morning Peak Hour	Afternoon Peak Hour
A	65	~~44~~ 43
B	24	~~18~~ 19
C	12	~~23~~ 22
D	3	~~10~~ 11
E	3	9
F	1	4
Total	**108**	**108**

TABLE 19
EXISTING WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2012)
SIGNIFICANT INTERSECTION IMPACT ANALYSIS

No.	City	Intersection	Peak Hour	Existing without Project		Existing with Project				Existing with Project with Mitigation			
				V/C	LOS	V/C	LOS	Δ V/C	Impact	V/C	LOS	Δ V/C	Impact
28.	LA	Sepulveda Boulevard & Manchester Avenue	A.M. P.M.	0.750 0.767	C C	0.780 0.828	C D	0.030 0.061	NO **YES**	~~0.640~~ 0.649 ~~0.757~~ 0.766	B C	~~0.11~~ - 0.101 ~~0.010~~ - 0.001	NO NO
39.	LA	La Tijera Boulevard & Manchester Avenue	A.M. P.M.	0.455 0.515	A A	0.520 0.596	A A	0.065 0.081	NO NO	~~0.506~~ 0.507 ~~0.582~~ 0.584	A A	~~0.051~~ 0.052 ~~0.067~~ 0.069	NO NO
46.	LA	Airport Boulevard & Manchester Avenue	A.M. P.M.	0.578 0.806	A D	0.640 0.865	B D	0.062 0.059	NO **YES**	~~0.598~~ 0.599 ~~0.799~~ 0.801	A ~~C~~ D	~~0.020~~ 0.021 ~~0.007~~ - 0.005	NO NO
47.	IW	Aviation Boulevard / Florence Avenue & Manchester Avenue	A.M. P.M.	0.601 0.685	B B	0.661 0.726	B C	0.060 0.041	NO **YES**	~~0.635~~ 0.637 ~~0.703~~ 0.705	B C	~~0.034~~ 0.036 ~~0.018~~ 0.020	NO NO
49.	IW	La Cienega Boulevard & Manchester Avenue	A.M. P.M.	0.596 0.828	A D	0.601 0.847	B D	0.005 0.019	NO NO	~~0.583~~ 0.584 ~~0.829~~ 0.830	A D	~~0.013~~ - 0.012 ~~0.001~~ 0.002	NO NO
50.	IW	Ash Avenue / I-405 Northbound Ramps & Manchester Avenue	A.M. P.M.	0.624 0.711	B C	0.648 0.735	B C	0.024 0.024	NO NO	~~0.630~~ 0.631 ~~0.713~~ 0.715	B C	~~0.006~~ 0.007 ~~0.002~~ 0.004	NO NO
51.	IW	Inglewood Avenue & Manchester Avenue	A.M. P.M.	0.471 0.597	A A	0.498 0.622	A B	0.027 0.025	NO NO	~~0.475~~ 0.477 ~~0.600~~ 0.601	A ~~A~~ B	~~0.004~~ 0.006 ~~0.003~~ 0.004	NO NO
91.	LA	Falmouth Avenue &	A.M.	0.125	A	0.137	A	0.012	NO	~~0.126~~	A	~~0.001~~	NO

TABLE 19
EXISTING WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2012)
SIGNIFICANT INTERSECTION IMPACT ANALYSIS

No.	City	Intersection	Peak Hour	Existing without Project		Existing with Project				Existing with Project with Mitigation			
				V/C	LOS	V/C	LOS	Δ V/C	Impact	V/C	LOS	Δ V/C	Impact
		Manchester Avenue	P.M.	0.107	A	0.125	A	0.018	NO	0.134 ~~0.114~~ 0.122	A	0.009 ~~0.007~~ 0.015	NO
96.	LA	Emerson Avenue & Manchester Avenue	A.M. P.M.	0.447 0.380	A A	0.493 0.416	A A	0.046 0.036	NO NO	~~0.481~~ 0.489 ~~0.404~~ 0.412	A A	~~0.034~~ 0.042 ~~0.024~~ 0.032	NO NO

TABLE 20
FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2022)
INTERSECTION PEAK HOUR LEVELS OF SERVICE

No.	City	Intersection	Peak Hour	V/C	LOS
12.	LA	Lincoln Boulevard & Manchester Avenue	A.M. P.M.	0.606 ~~0.723~~ 0.724	B C
28.	LA	Sepulveda Boulevard & Manchester Avenue	A.M. P.M.	~~0.658~~ 0.667 ~~0.803~~ 0.812	B D
39.	LA	La Tijera Boulevard & Manchester Avenue	A.M. P.M.	~~0.565~~ 0.567 ~~0.621~~ 0.622	A B
46.	LA	Airport Boulevard & Manchester Avenue	A.M. P.M.	~~0.666~~ 0.667 ~~0.906~~ 0.907	B E
47.	IW	Aviation Boulevard / Florence Avenue & Manchester Avenue	A.M. P.M.	~~0.711~~ 0.713 ~~0.854~~ 0.855	C D
49.	IW	La Cienega Boulevard & Manchester Avenue	A.M. P.M.	~~0.684~~ 0.685 ~~0.913~~ 0.914	B E
50.	IW	Ash Avenue / I-405 Northbound Ramps & Manchester Avenue	A.M. P.M.	~~0.683~~ 0.684 ~~0.777~~ 0.778	B C
51.	IW	Inglewood Avenue & Manchester Avenue	A.M. P.M.	~~0.551~~ 0.552 ~~0.682~~ 0.683	A B
96.	LA	Emerson Avenue & Manchester Avenue	A.M. P.M.	~~0.533~~ 0.541 ~~0.450~~ 0.458	A A

TABLE 21
FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2022)
SIGNIFICANT INTERSECTION IMPACT ANALYSIS

No.	City	Intersection	Peak Hour	Future without Project		Future with Project				Future with Project with Mitigation			
				V/C	LOS	V/C	LOS	Δ V/C	Impact	V/C	LOS	Δ V/C	Impact
12.	LA	Lincoln Boulevard & Manchester Avenue	A.M. P.M.	0.615 0.692	B B	0.725 0.812	C D	0.110 0.120	**YES** **YES**	0.606 ~~0.723~~ 0.724	B C	-0.009 ~~0.031~~ 0.032	NO NO
28.	LA	Sepulveda Boulevard & Manchester Avenue	A.M. P.M.	0.768 0.834	C D	0.798 0.896	C D	0.030 0.062	NO **YES**	~~0.658~~ 0.667 ~~0.803~~ 0.812	B D	~~-0.110~~ -0.101 ~~-0.031~~ -0.040	NO NO
39.	LA	La Tijera Boulevard & Manchester Avenue	A.M. P.M.	0.515 0.553	A A	0.579 0.635	A B	0.064 0.082	NO NO	~~0.565~~ 0.567 ~~0.621~~ 0.622	A B	~~0.050~~ 0.052 ~~0.068~~ 0.069	NO NO
46.	LA	Airport Boulevard & Manchester Avenue	A.M. P.M.	0.653 0.917	B E	0.715 0.976	C E	0.062 0.059	**YES** **YES**	~~0.666~~ 0.667 ~~0.906~~ 0.907	B E	~~0.013~~ 0.014 ~~-0.011~~ -0.010	NO NO
47.	IW	Aviation Boulevard / Florence Avenue & Manchester Avenue	A.M. P.M.	0.684 0.836	B D	0.736 0.877	C D	0.052 0.041	**YES** **YES**	~~0.711~~ 0.713 ~~0.854~~ 0.855	C D	~~0.027~~ 0.029 ~~0.018~~ 0.019	NO NO
49.	IW	La Cienega Boulevard & Manchester Avenue	A.M. P.M.	0.697 0.911	B E	0.702 0.932	C E	0.005 0.021	NO **YES**	~~0.684~~ 0.685 ~~0.913~~ 0.914	B E	~~-0.013~~ -0.012 ~~0.002~~ 0.003	NO NO
50.	IW	Ash Avenue / I-405 Northbound Ramps & Manchester Avenue	A.M. P.M.	0.677 0.775	B C	0.701 0.799	C C	0.024 0.024	NO NO	~~0.683~~ 0.684 ~~0.777~~ 0.778	B C	~~0.006~~ 0.007 ~~0.002~~ 0.003	NO NO
51.	IW	Inglewood Avenue & Manchester Avenue	A.M. P.M.	0.546 0.679	A B	0.573 0.704	A C	0.027 0.025	NO NO	~~0.551~~ 0.552 ~~0.682~~ 0.683	A B	~~0.005~~ 0.006 ~~0.003~~ 0.004	NO NO
96.	LA	Emerson Avenue & Manchester Avenue	A.M. P.M.	0.499 0.425	A A	0.545 0.462	A A	0.046 0.037	NO NO	~~0.533~~ 0.541 ~~0.450~~ 0.458	A A	~~0.034~~ 0.042 ~~0.025~~ 0.033	NO NO

TABLE 27
CMP TRANSIT CAPACITY ANALYSIS

Morning Peak Hour						
Provider and Route	**Number of Runs During Peak Hour** [a]	**Capacity** [b]	**Existing (Year 2012) Load Factor** [c]	**Future (Year 2022) Load Factor** [d]	**Residual Capacity per Run**	**Residual Capacity in Peak Hour**
Metro Bus						
~~42~~	~~4~~	~~50~~	~~0.66~~	~~0.73~~	~~14~~	~~56~~
					Total Residual Capacity in Peak Hour	**~~2,107~~ 2,051**

Afternoon Peak Hour						
Provider and Route	**Number of Runs During Peak Hour** [a]	**Capacity** [b]	**Existing (Year 2012) Load Factor** [c]	**Future (Year 2022) Load Factor** [d]	**Residual Capacity per Run**	**Residual Capacity in Peak Hour**
Metro Bus						
~~42~~	~~4~~	~~50~~	~~0.62~~	~~0.68~~	~~16~~	~~64~~
					Total Residual Capacity in Peak Hour	**~~2,175~~ 2,111**

TABLE 28
CMP TRANSIT IMPACT ANALYSIS

Description	Morning Peak Hour	Afternoon Peak Hour
Future without Project Capacity Surplus [a]	~~2,107~~ 2,051	~~2,175~~ 2,111
Project Transit Trips [b]	211	267
Future with Project Capacity Surplus	~~1,896~~ 1,840	~~1,908~~ 1,844

Notes:
[a] Future transit capacity surplus from Table 27.
[b] Project transit trips from Table 26.

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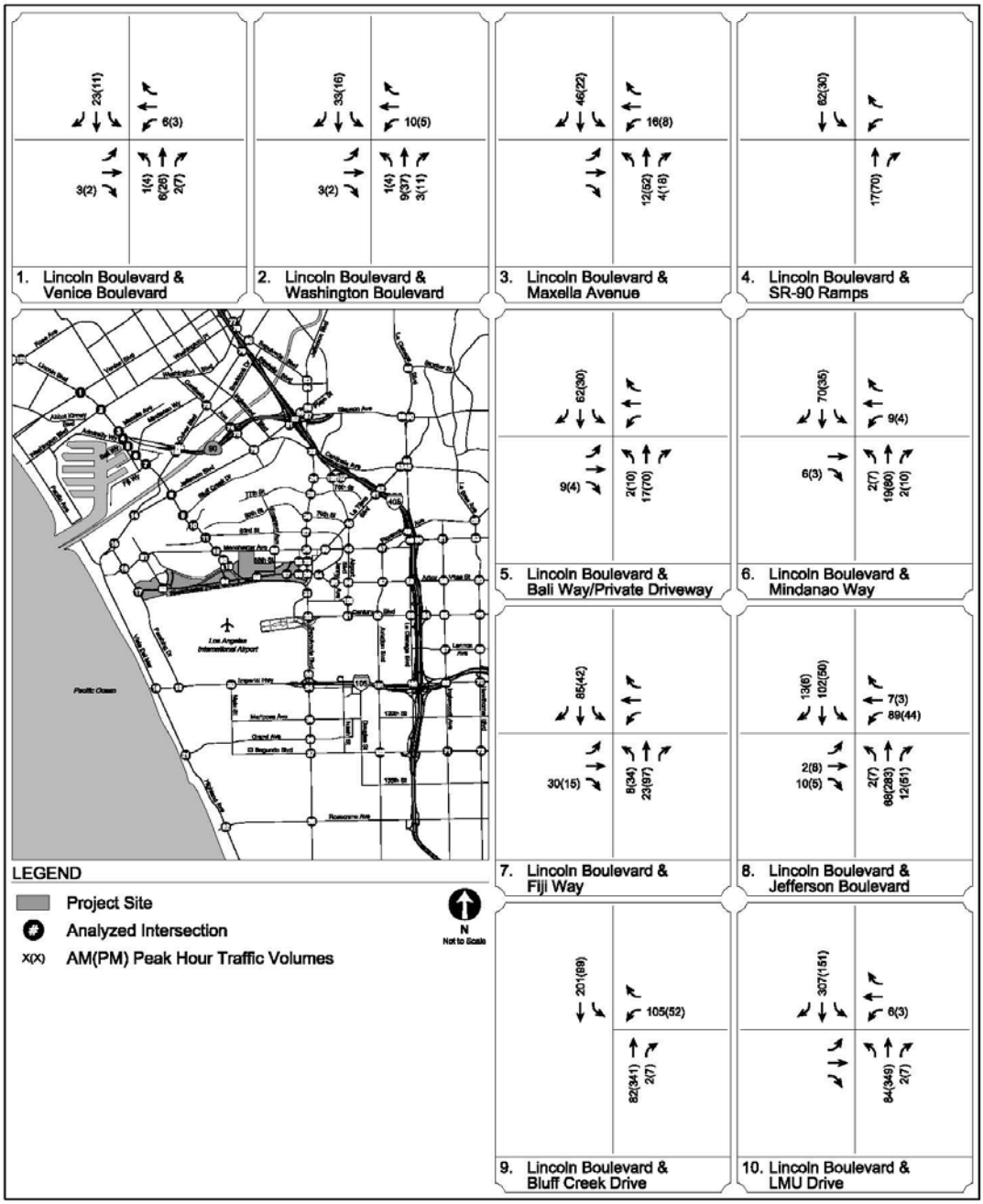
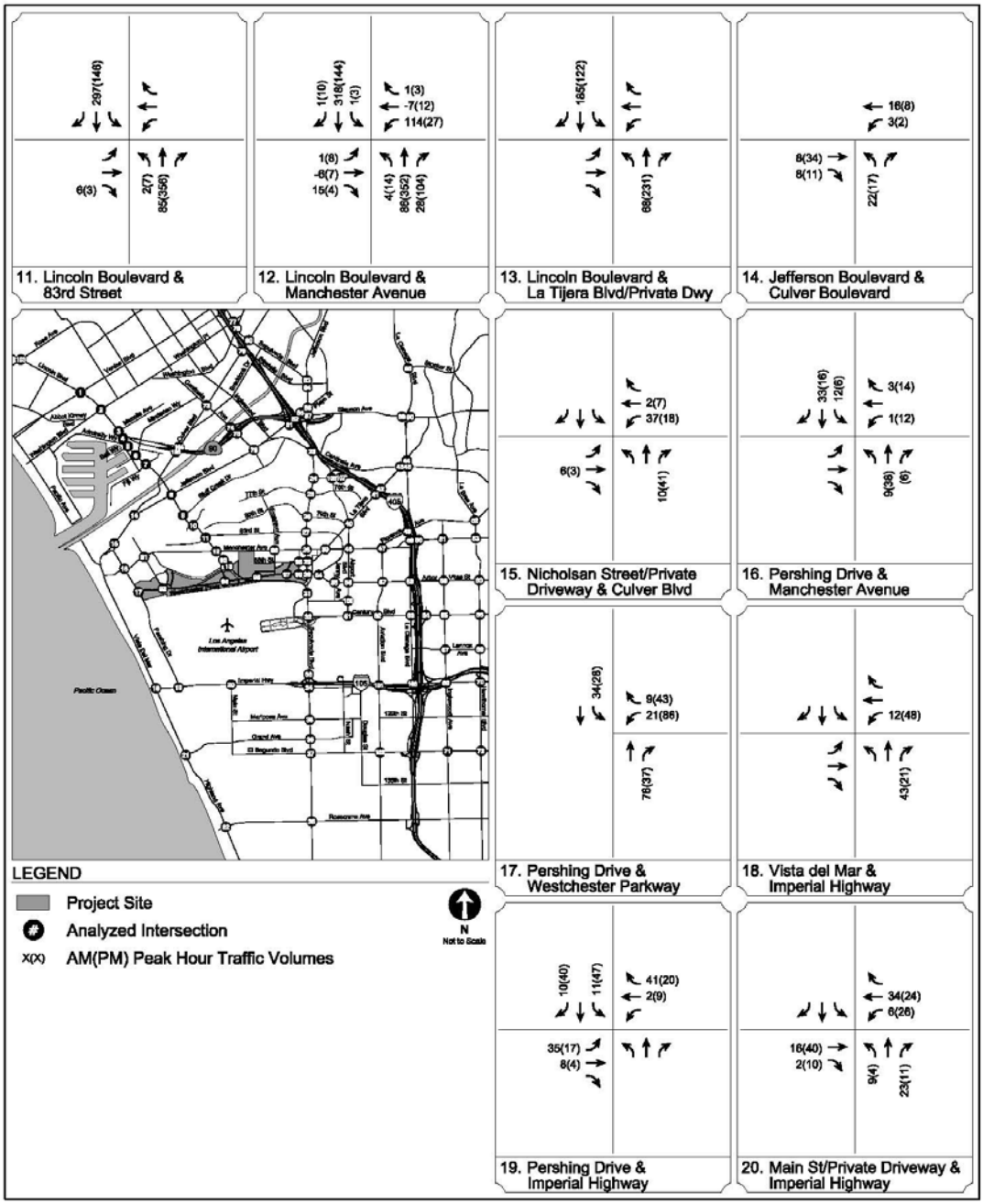
Replace Figures 15, 16, and 17 of Appendix E Traffic Study with the following revised figures:



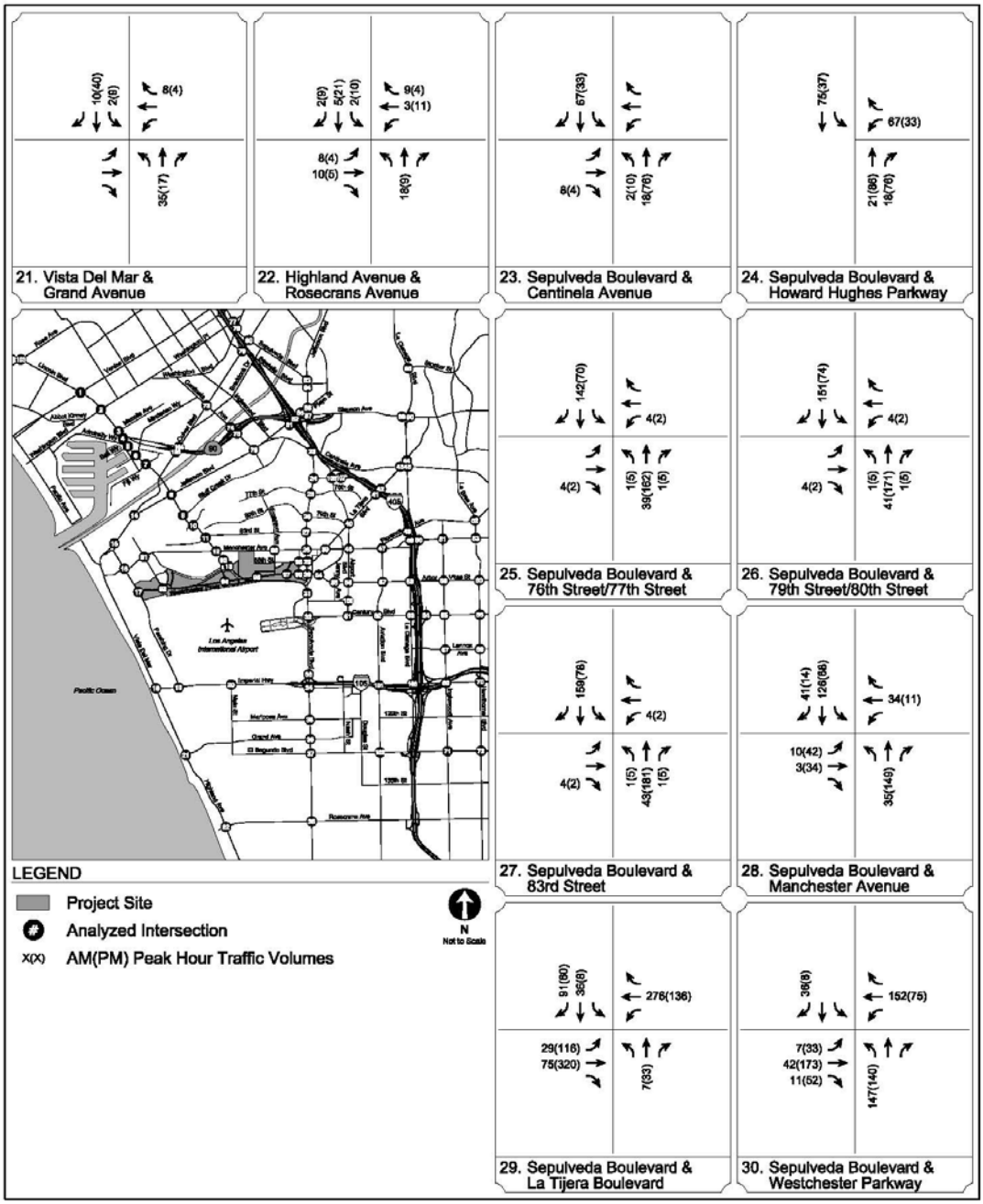
PROJECT-ONLY WITH MITIGATION CONDITIONS
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 15 A



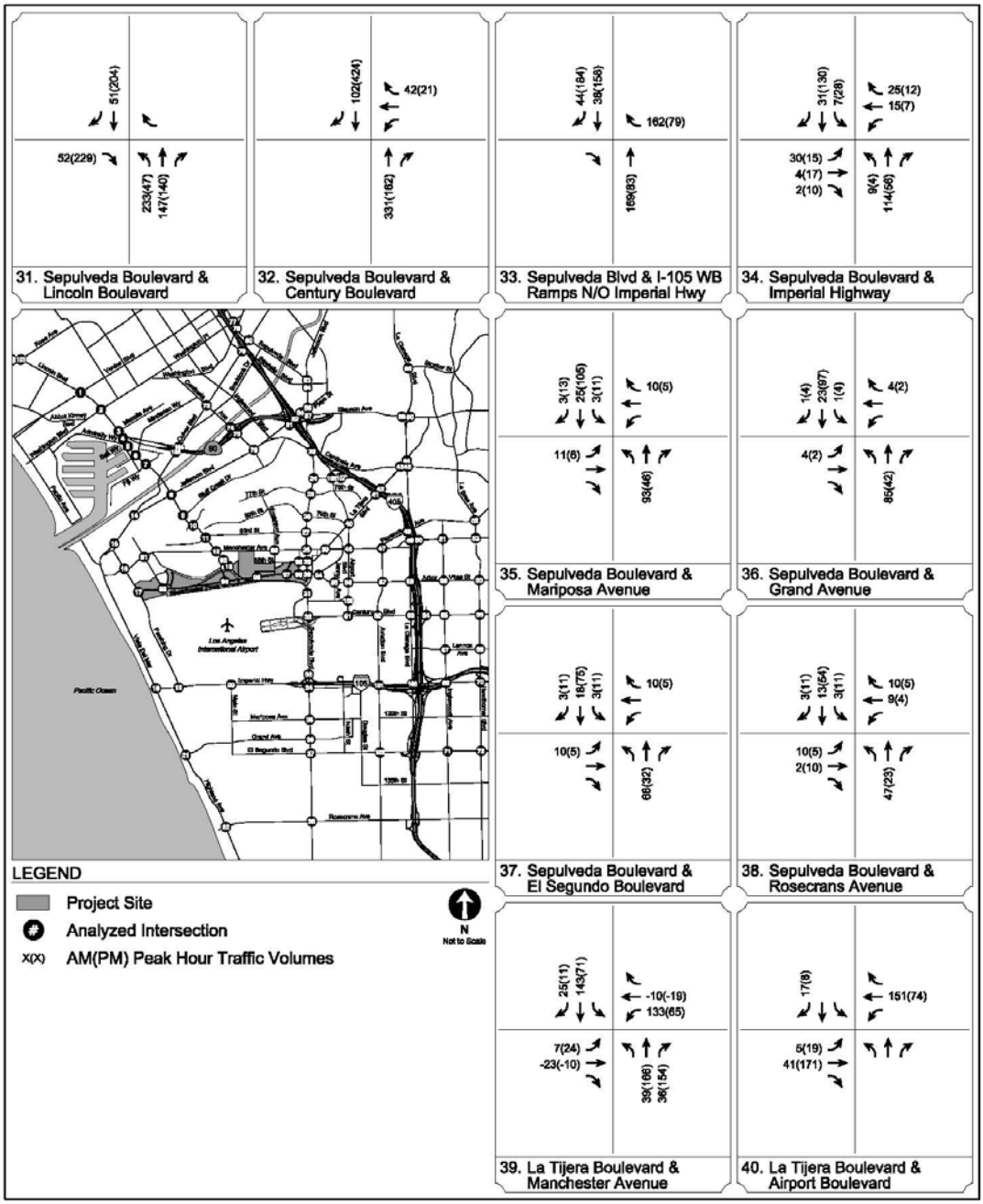
PROJECT-ONLY WITH MITIGATION CONDITIONS
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 15 B



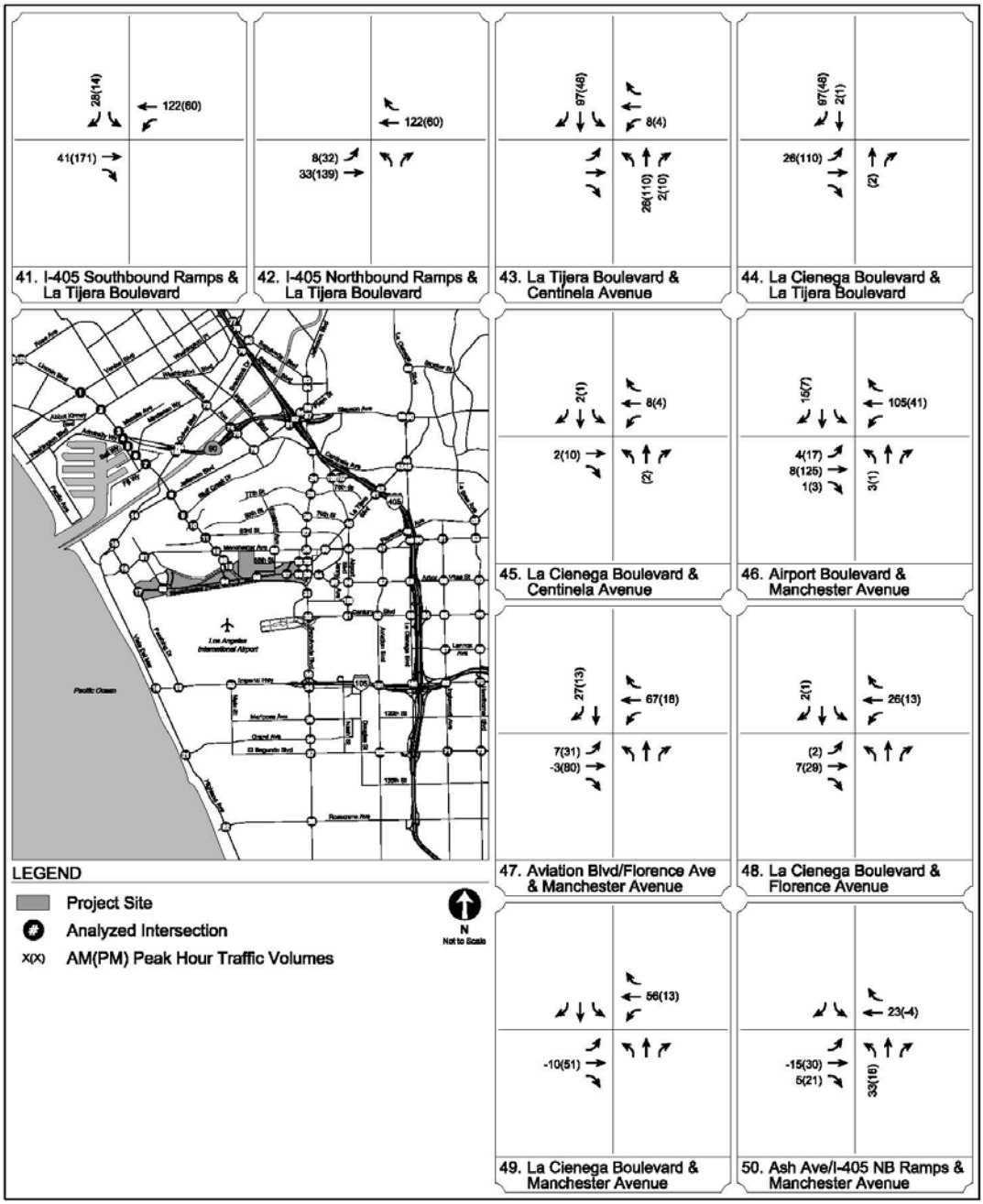
PROJECT-ONLY WITH MITIGATION CONDITIONS
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 15 C



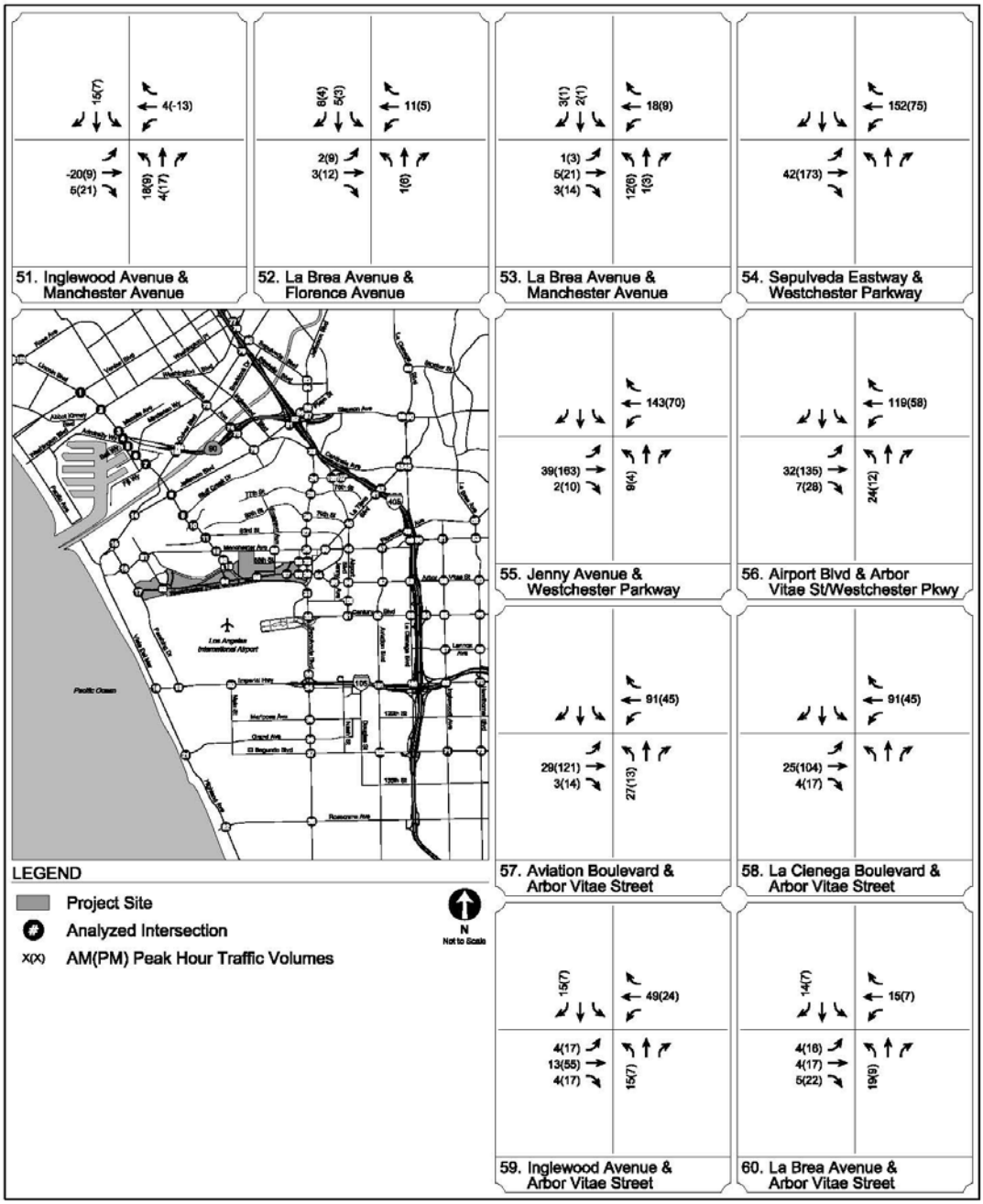
PROJECT-ONLY WITH MITIGATION CONDITIONS
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 15 D



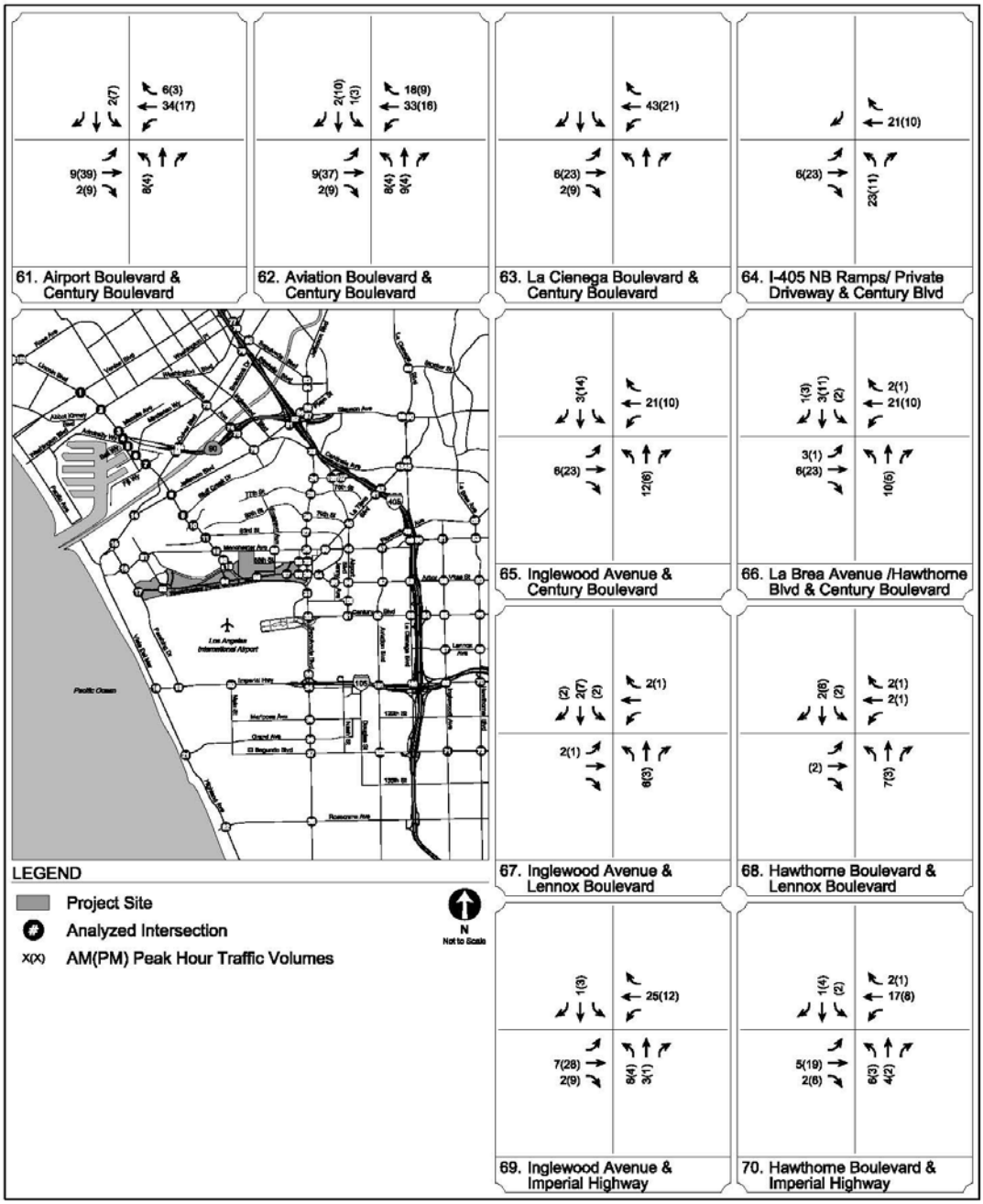
PROJECT-ONLY WITH MITIGATION CONDITIONS
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 15 E



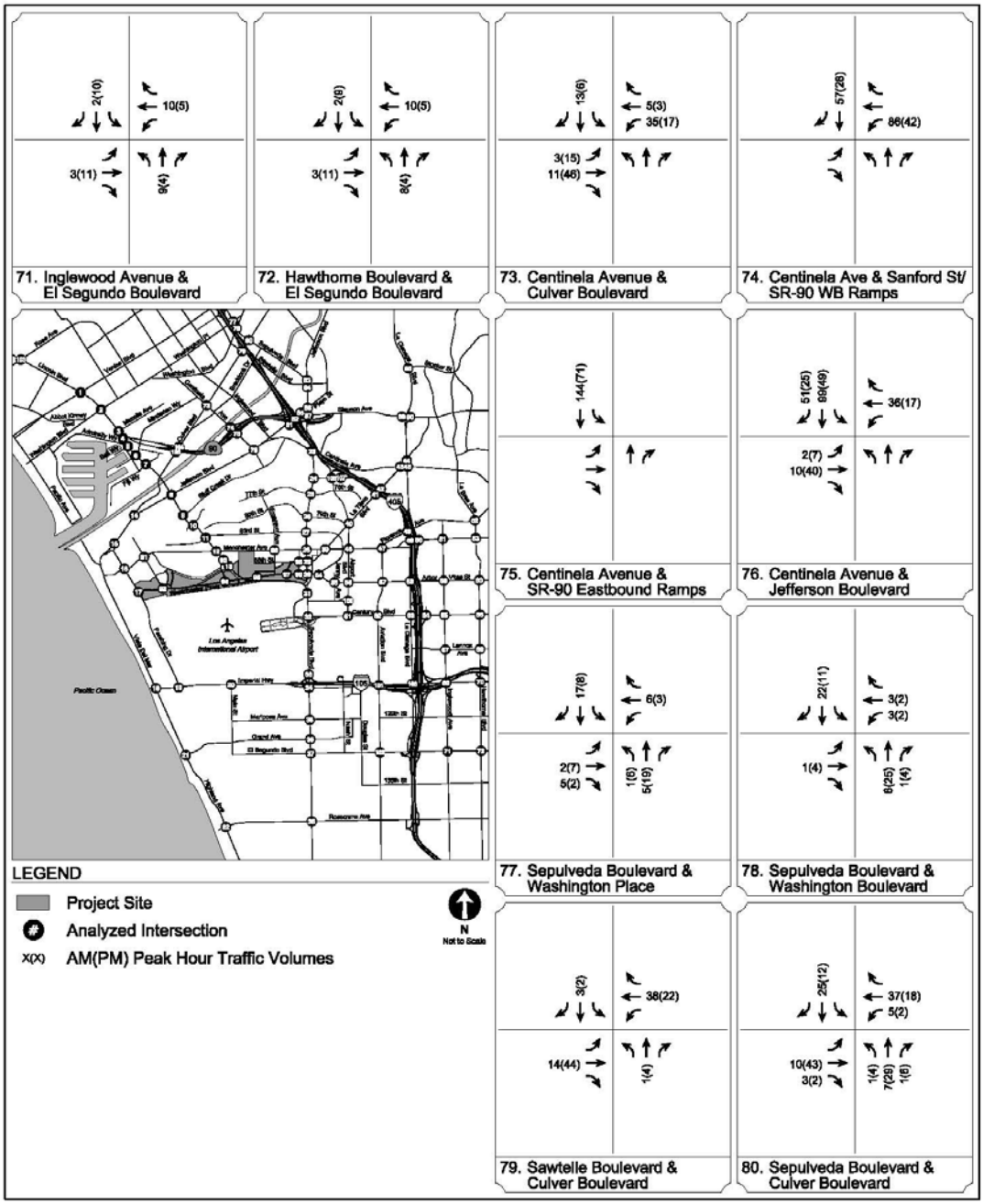
PROJECT-ONLY WITH MITIGATION CONDITIONS
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 15 F



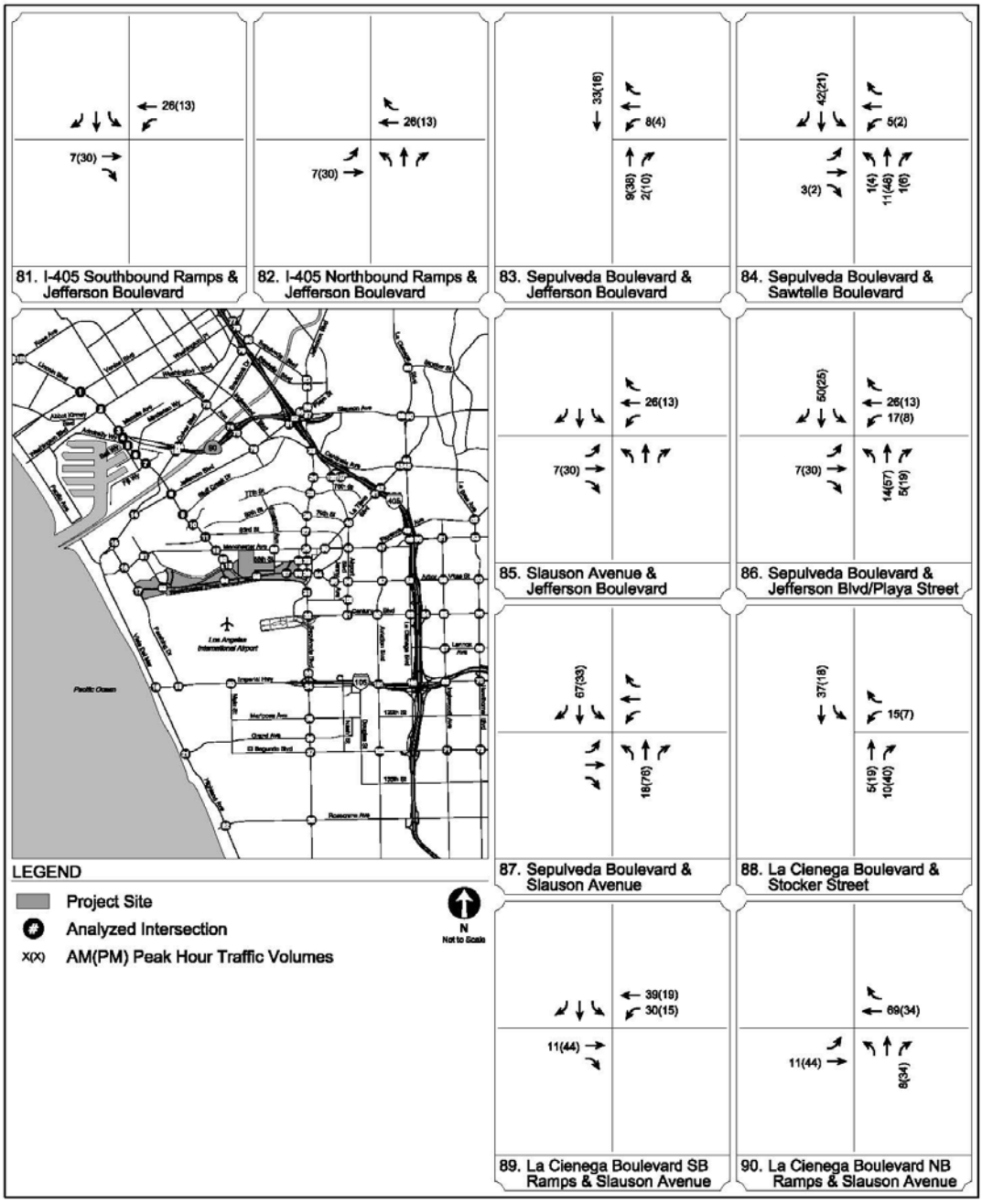
PROJECT-ONLY WITH MITIGATION CONDITIONS
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 15 G



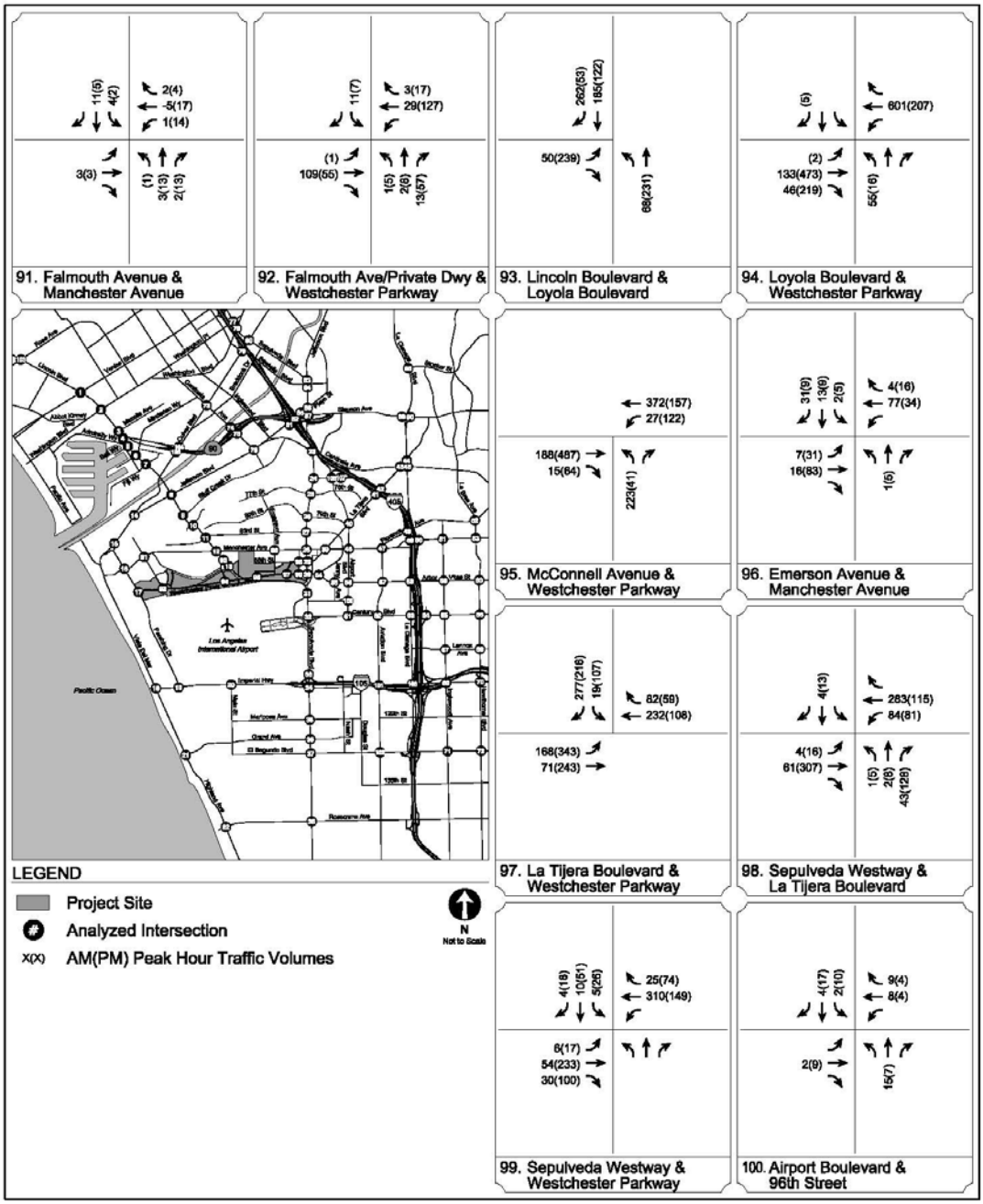
PROJECT-ONLY WITH MITIGATION CONDITIONS
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 15 H



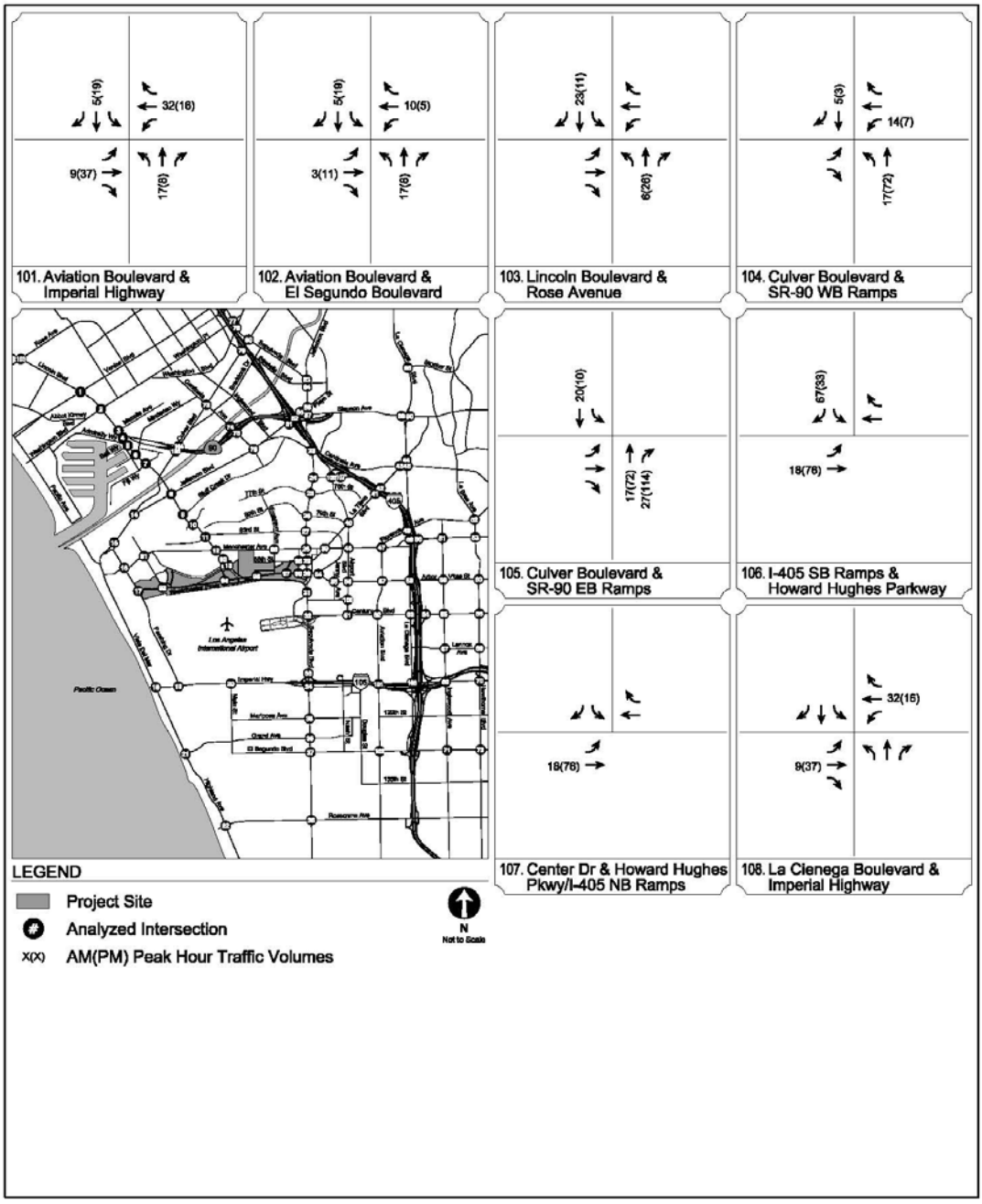
PROJECT-ONLY WITH MITIGATION CONDITIONS
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE
15 I



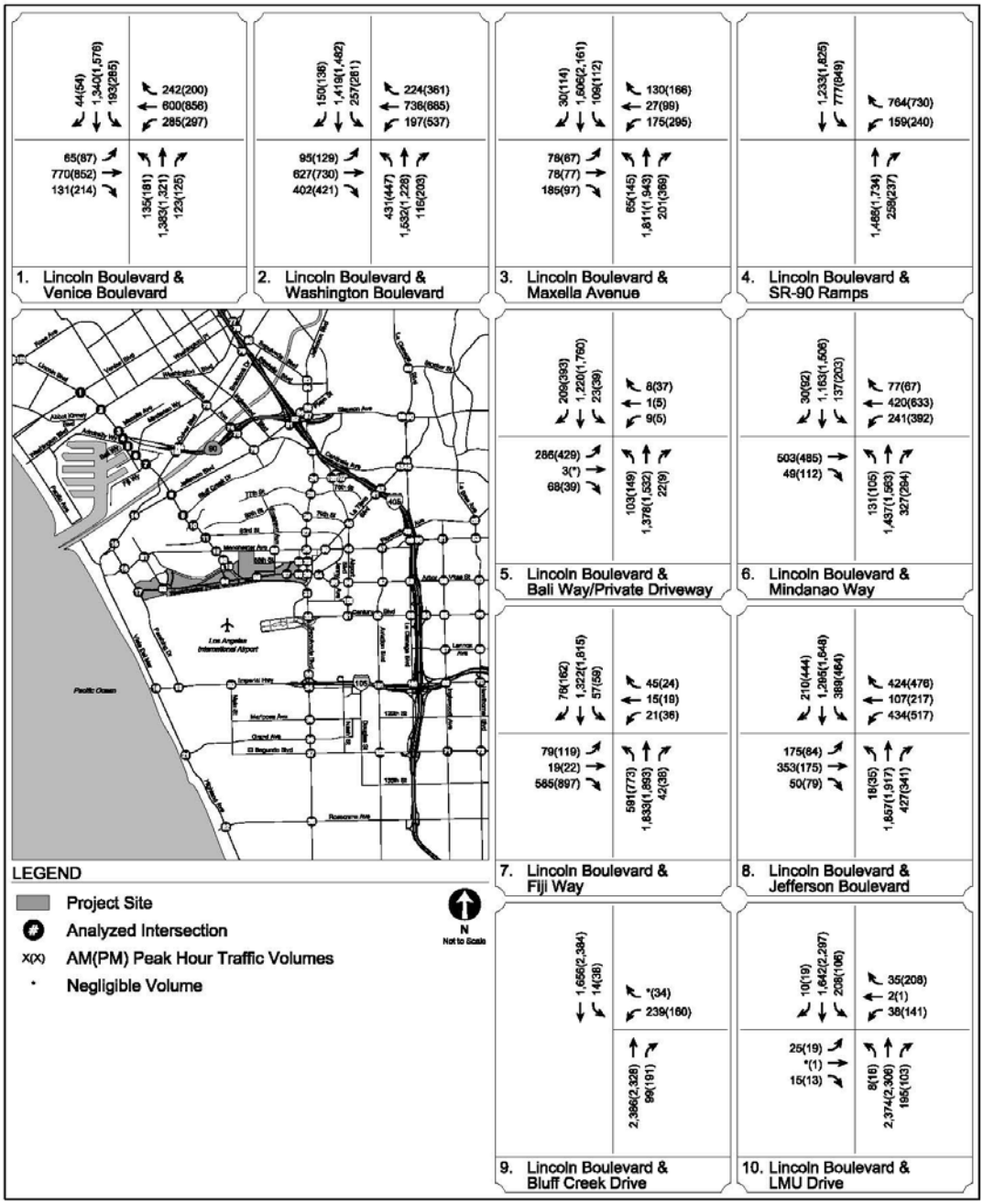
PROJECT-ONLY WITH MITIGATION CONDITIONS
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 15 J



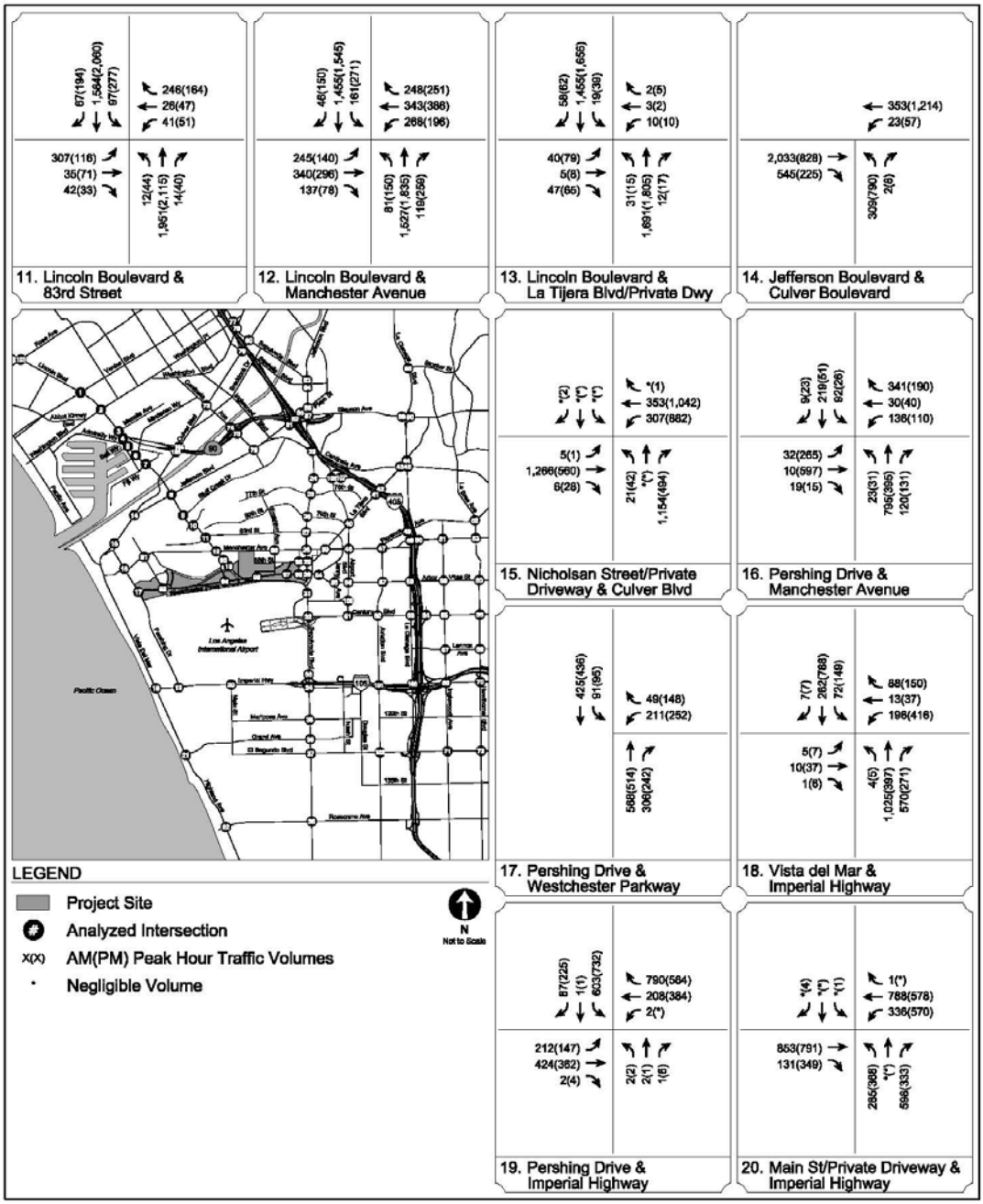
PROJECT-ONLY WITH MITIGATION CONDITIONS
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 15 K



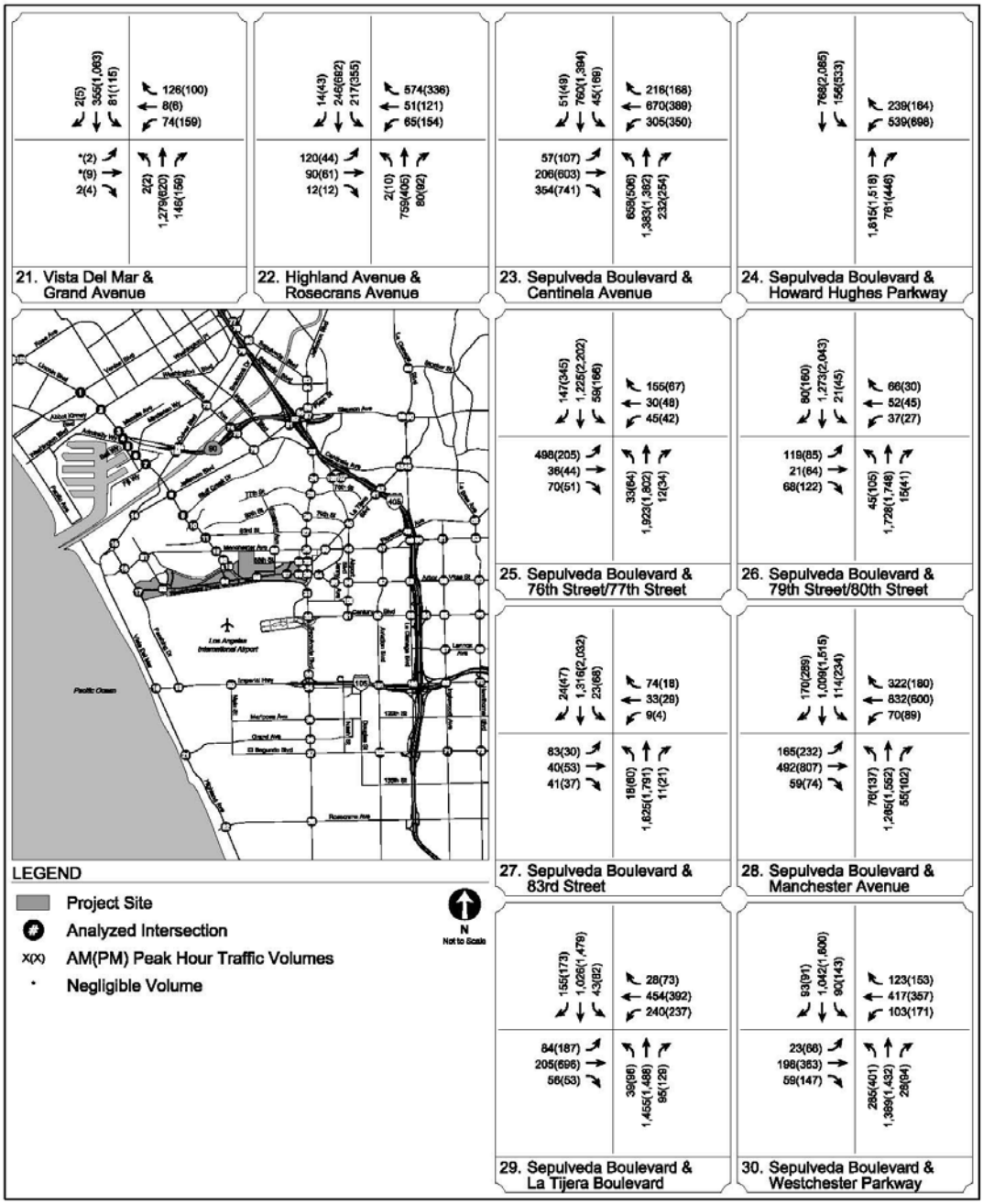
EXISTING WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2012)
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 16 A



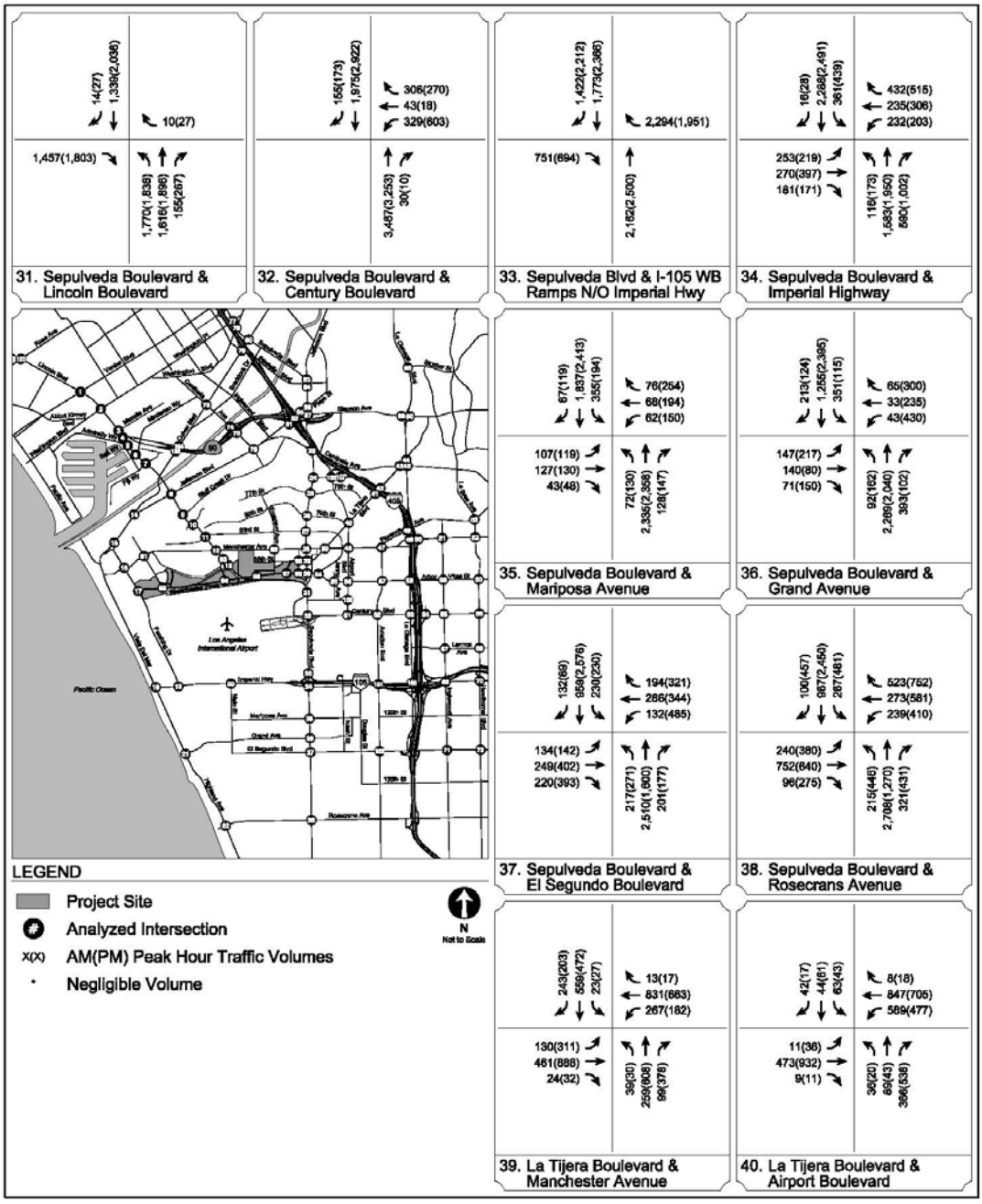
EXISTING WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2012)
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 16 B



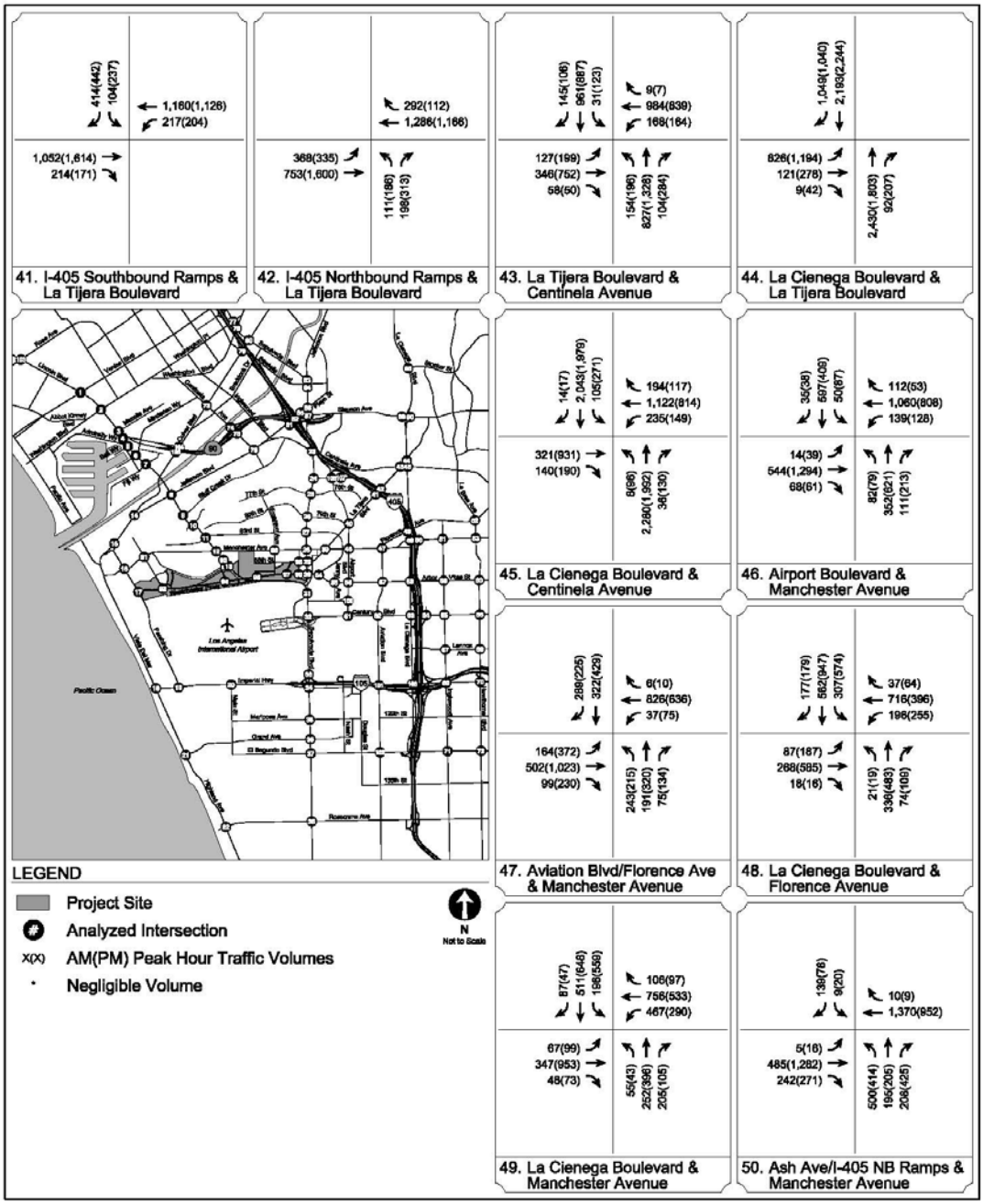
EXISTING WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2012)
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 16 C



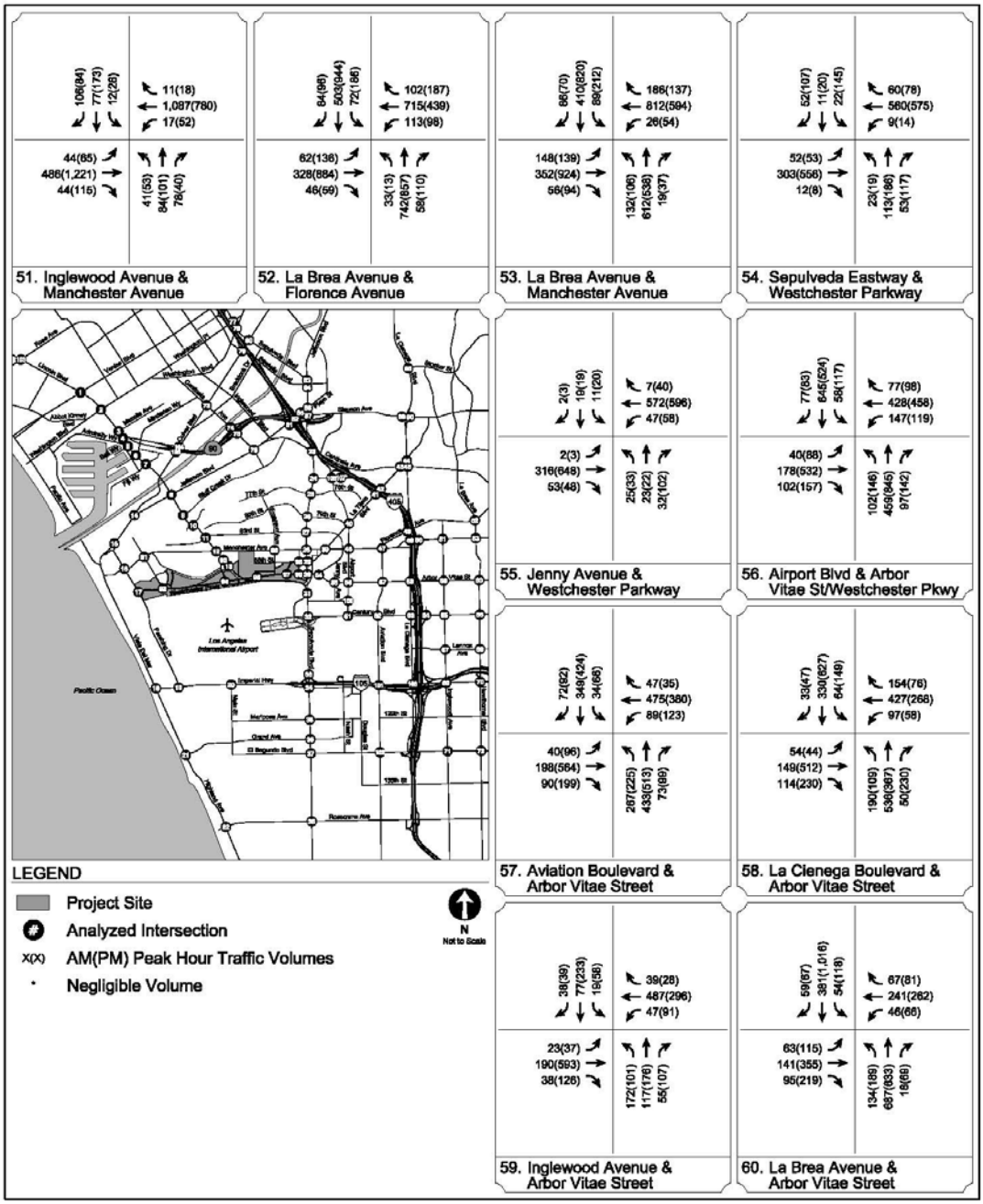
EXISTING WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2012)
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 16 D



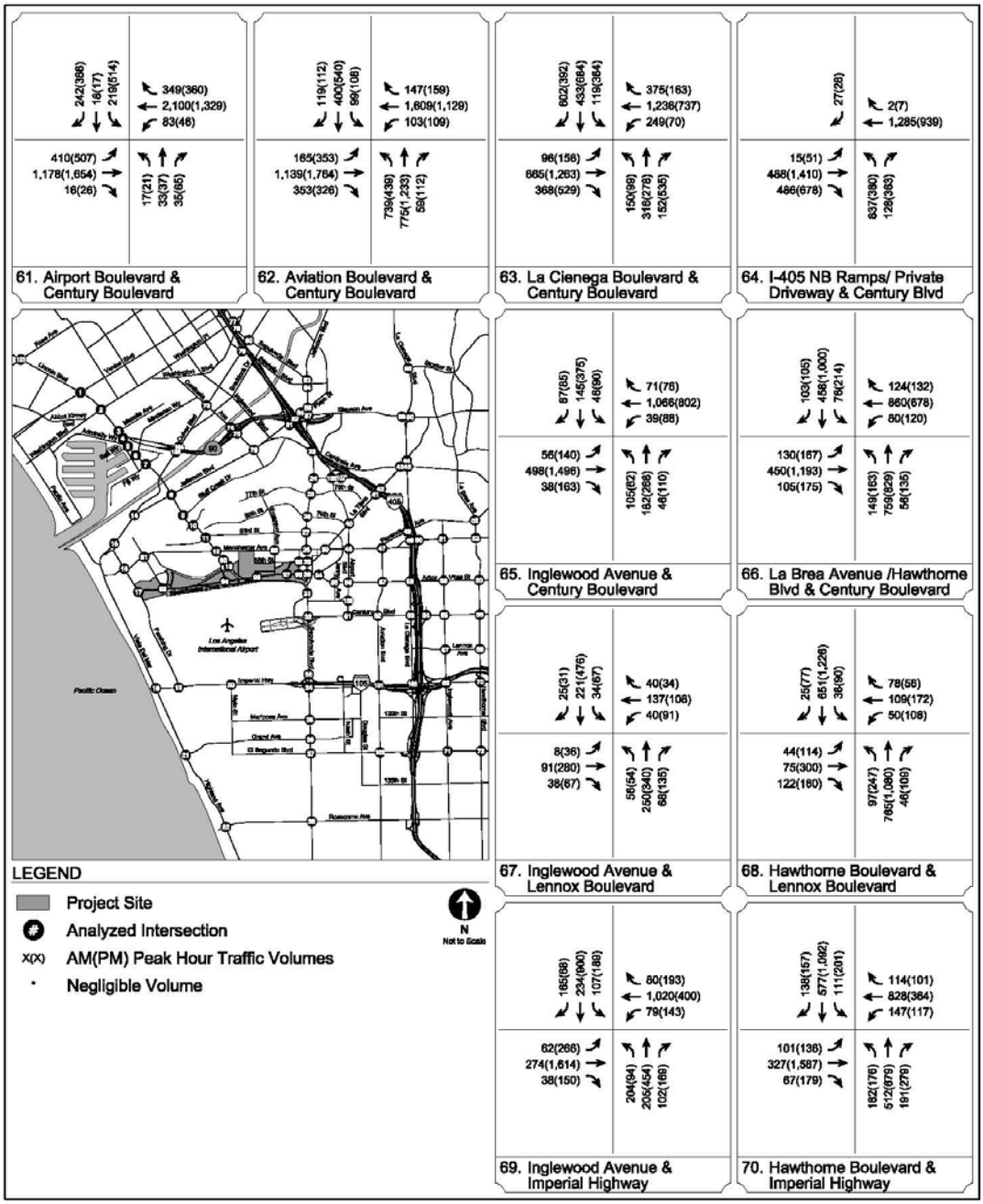
EXISTING WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2012)
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 16 E



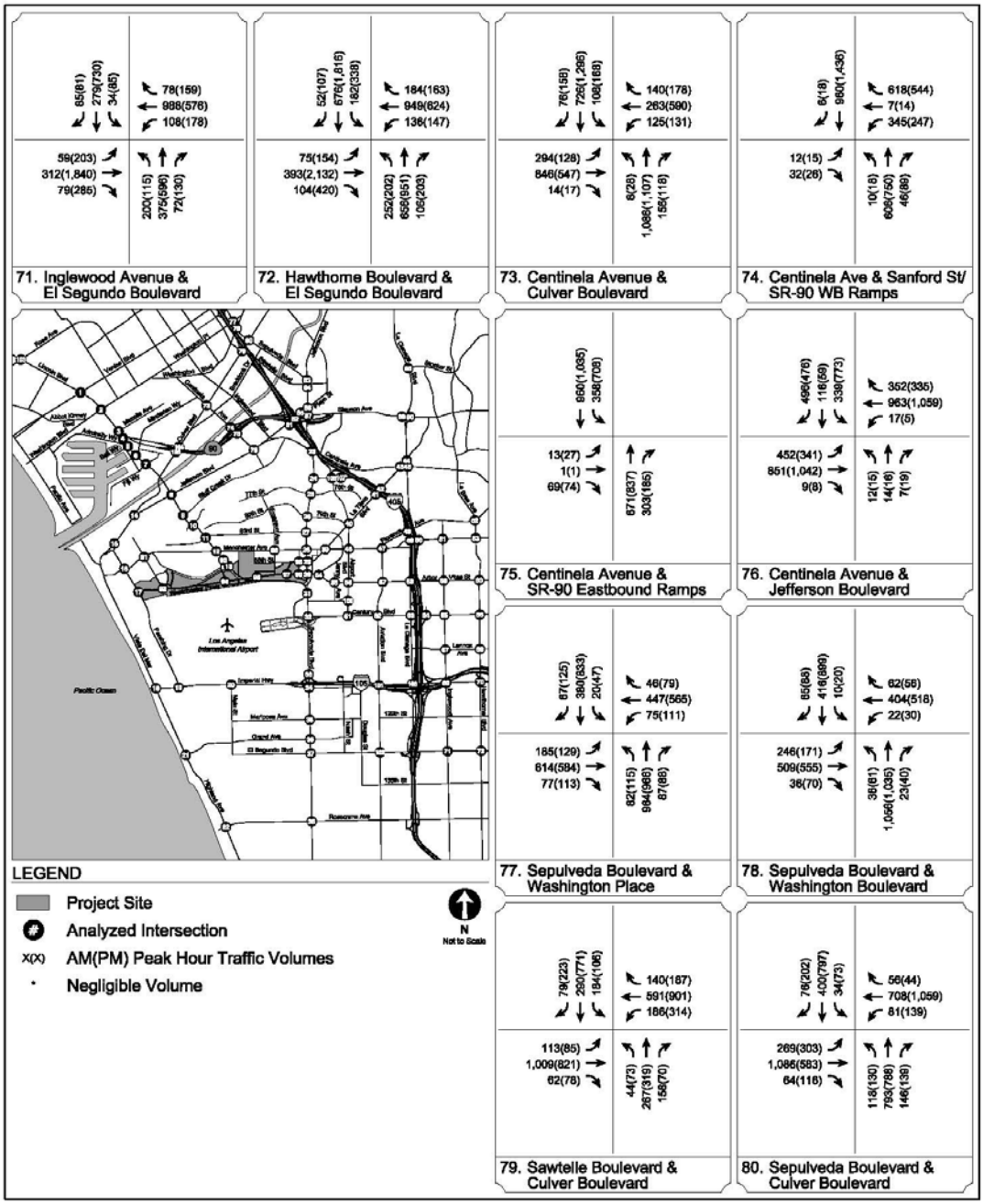
EXISTING WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2012)
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 16 F



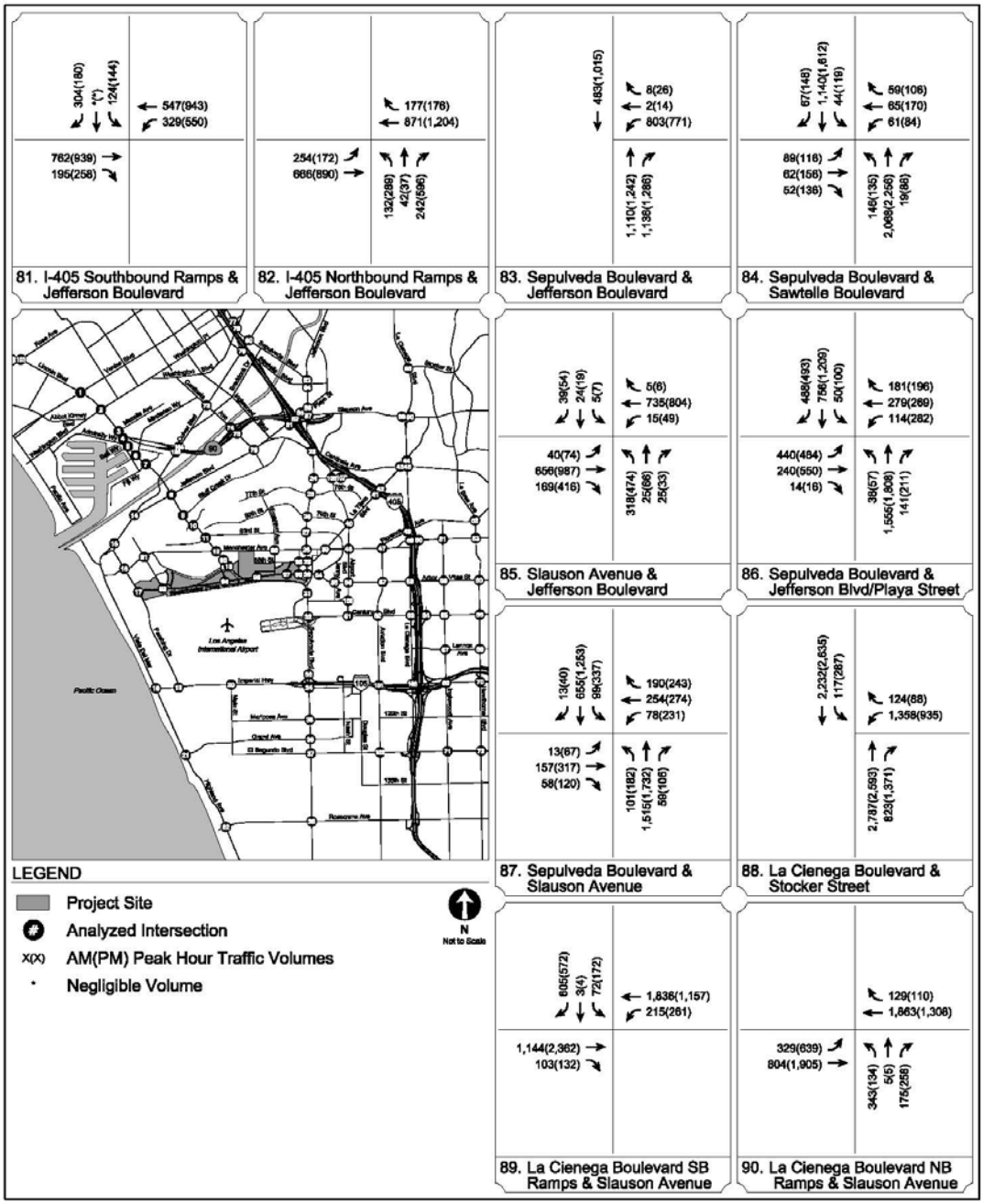
EXISTING WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2012)
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 16 G



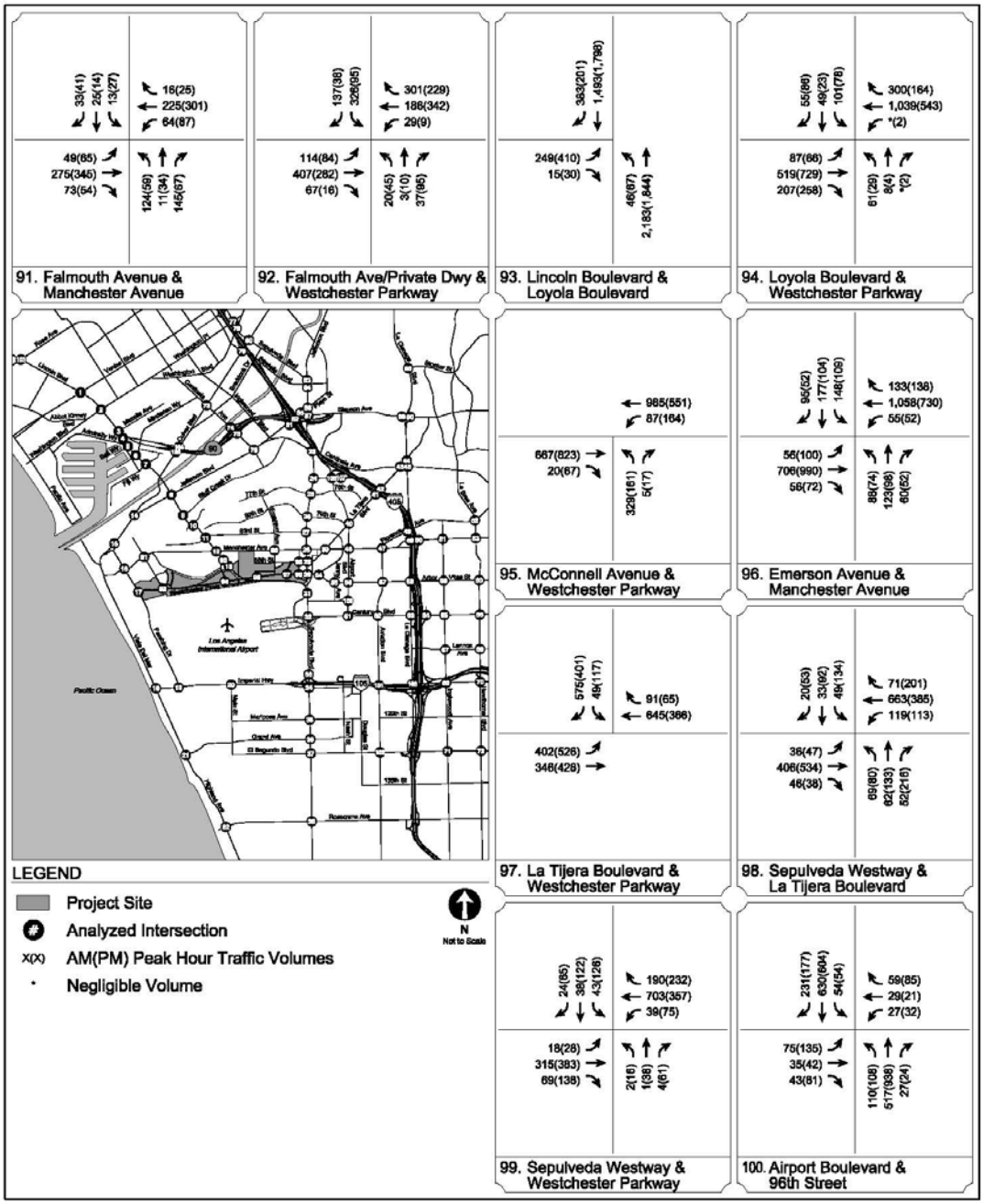
EXISTING WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2012)
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 16 H



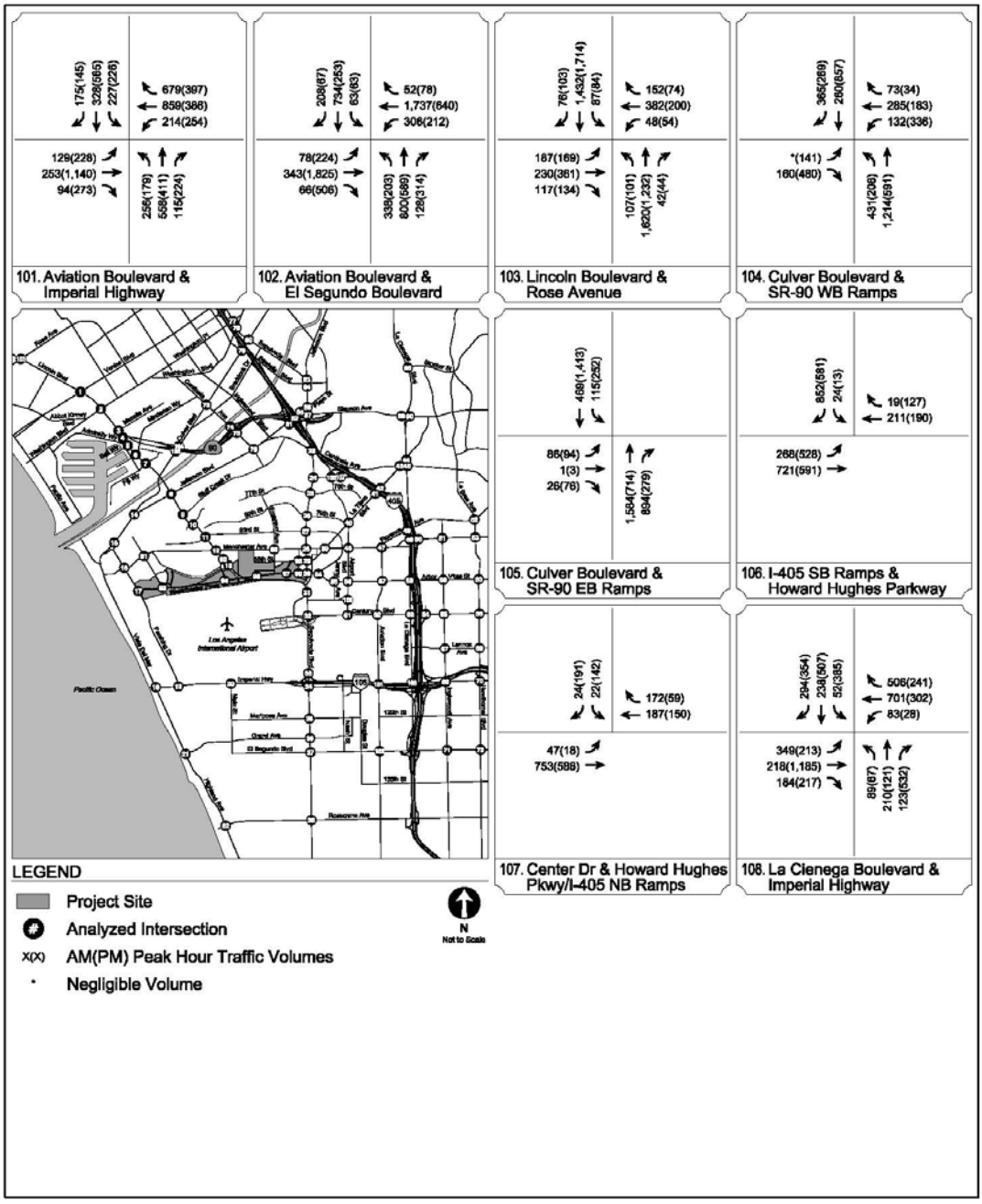
EXISTING WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2012)
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 16 I



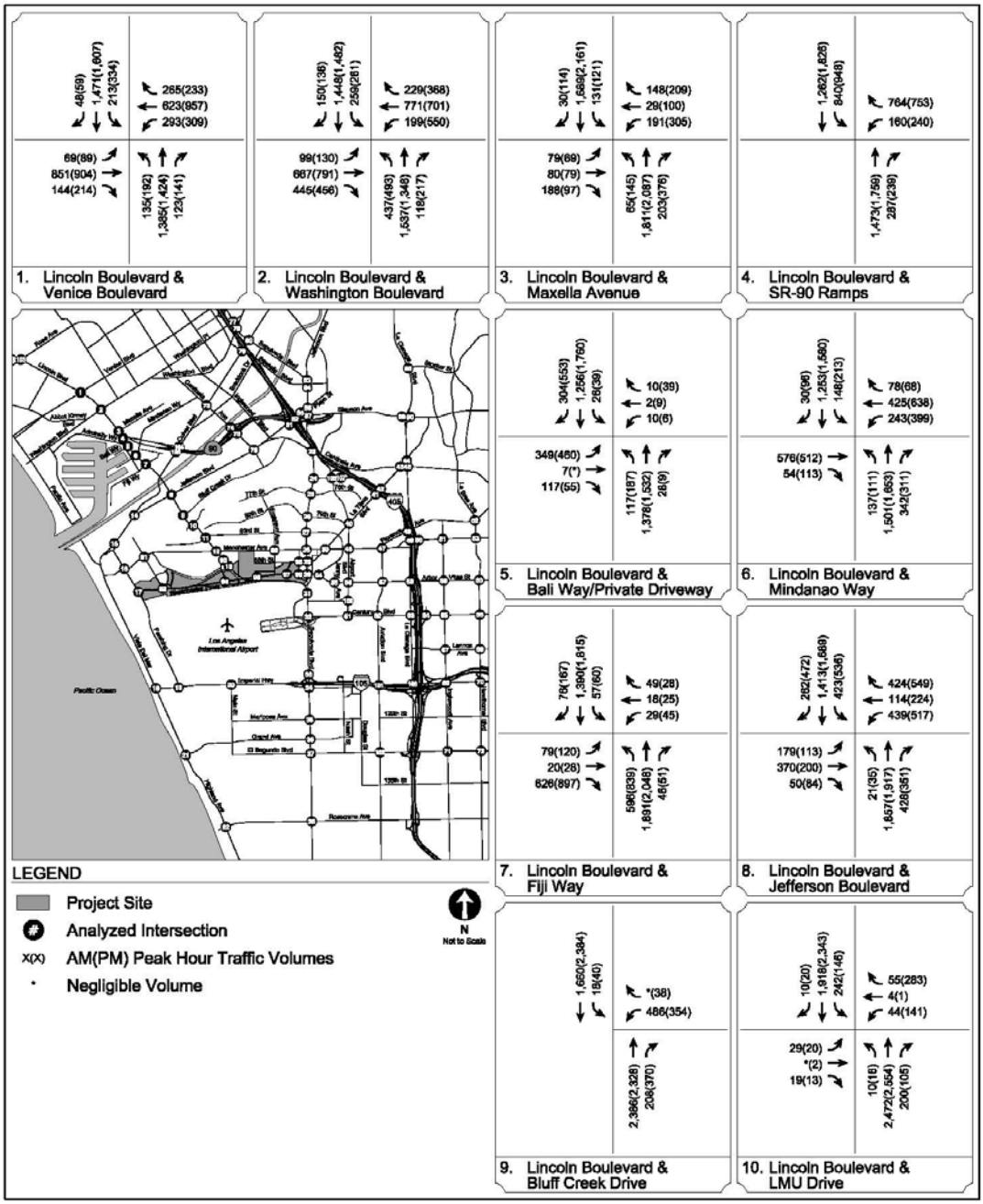
EXISTING WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2012)
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 16 J



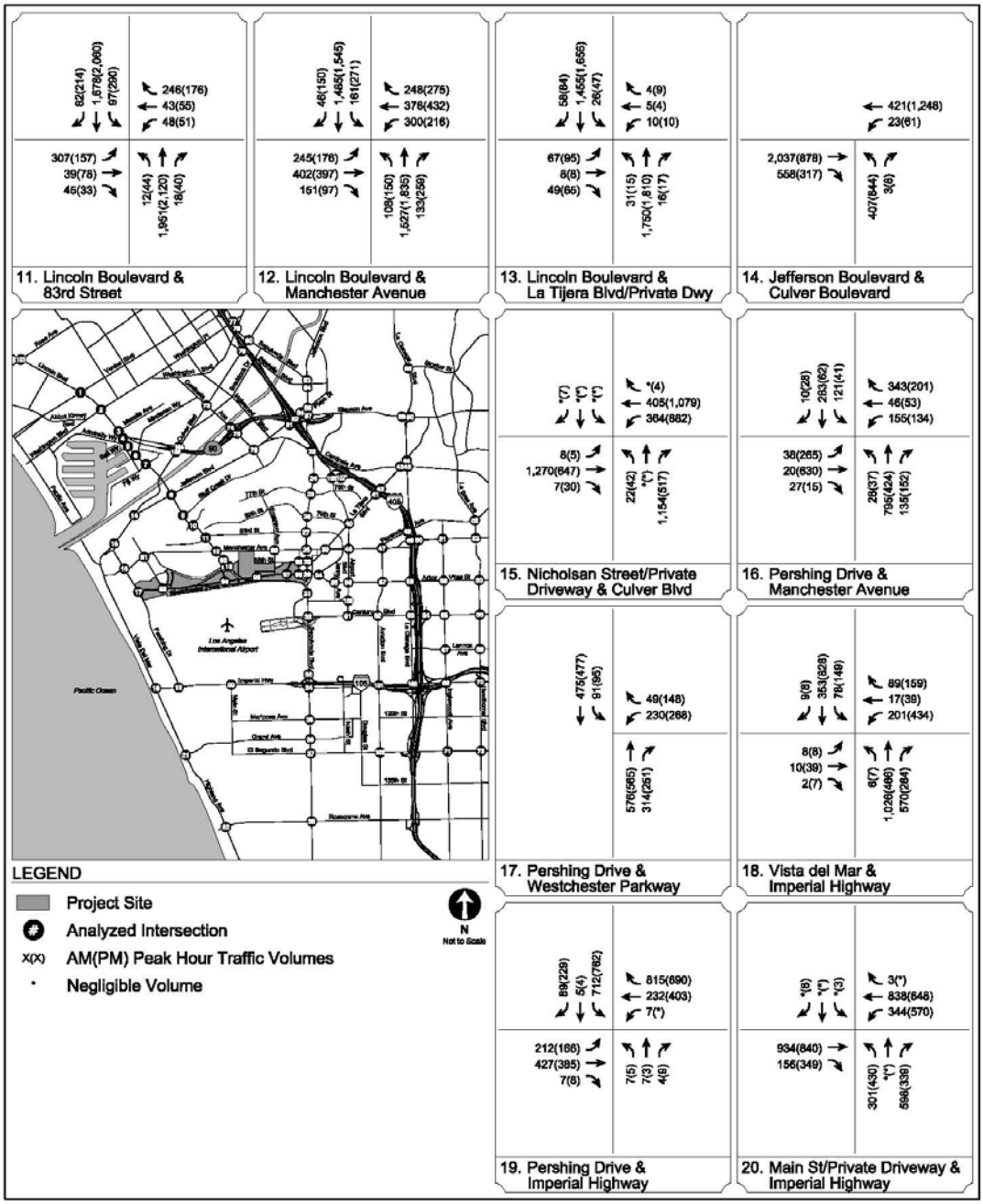
EXISTING WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2012)
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 16 K



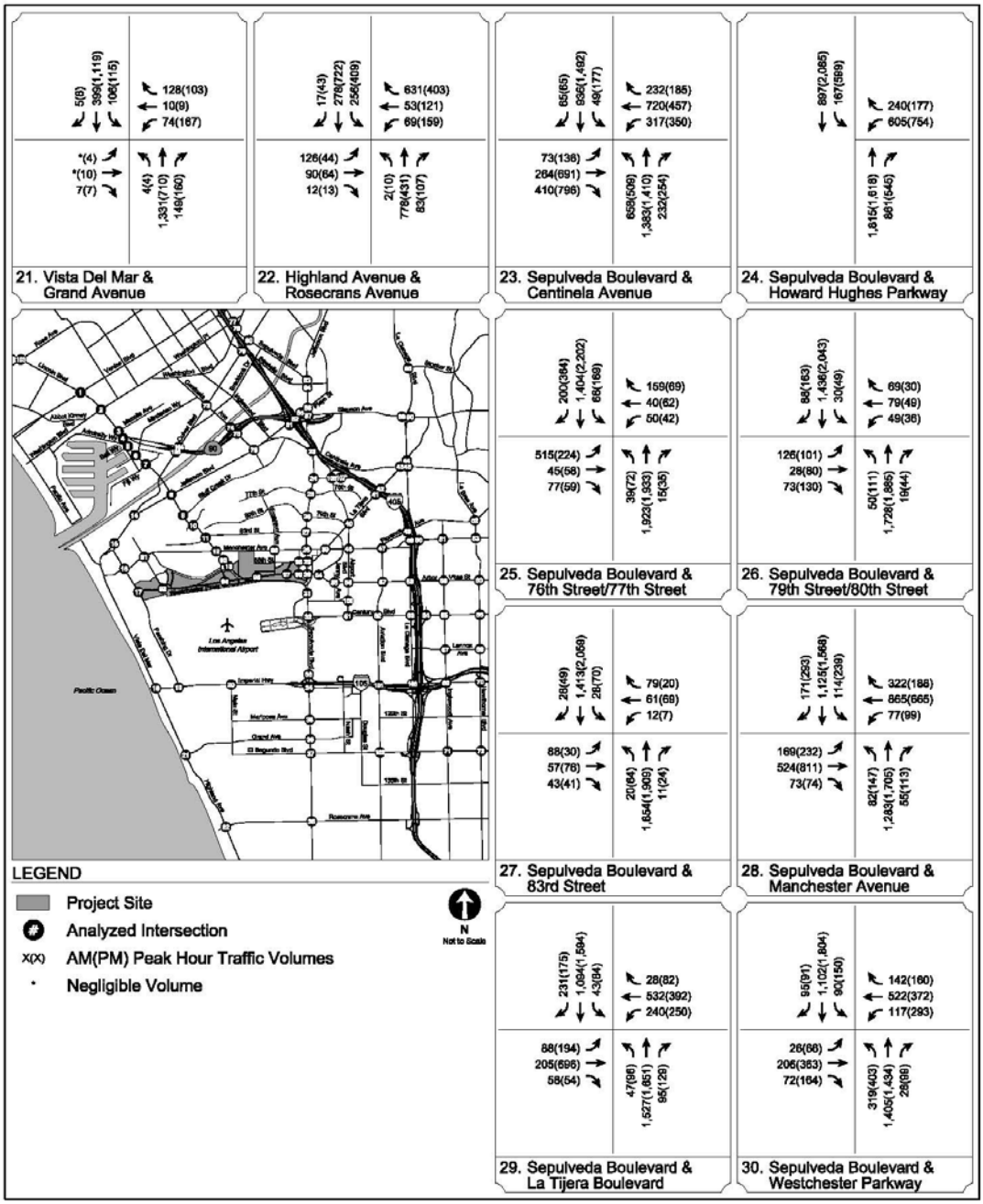
FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2022)
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 17 A



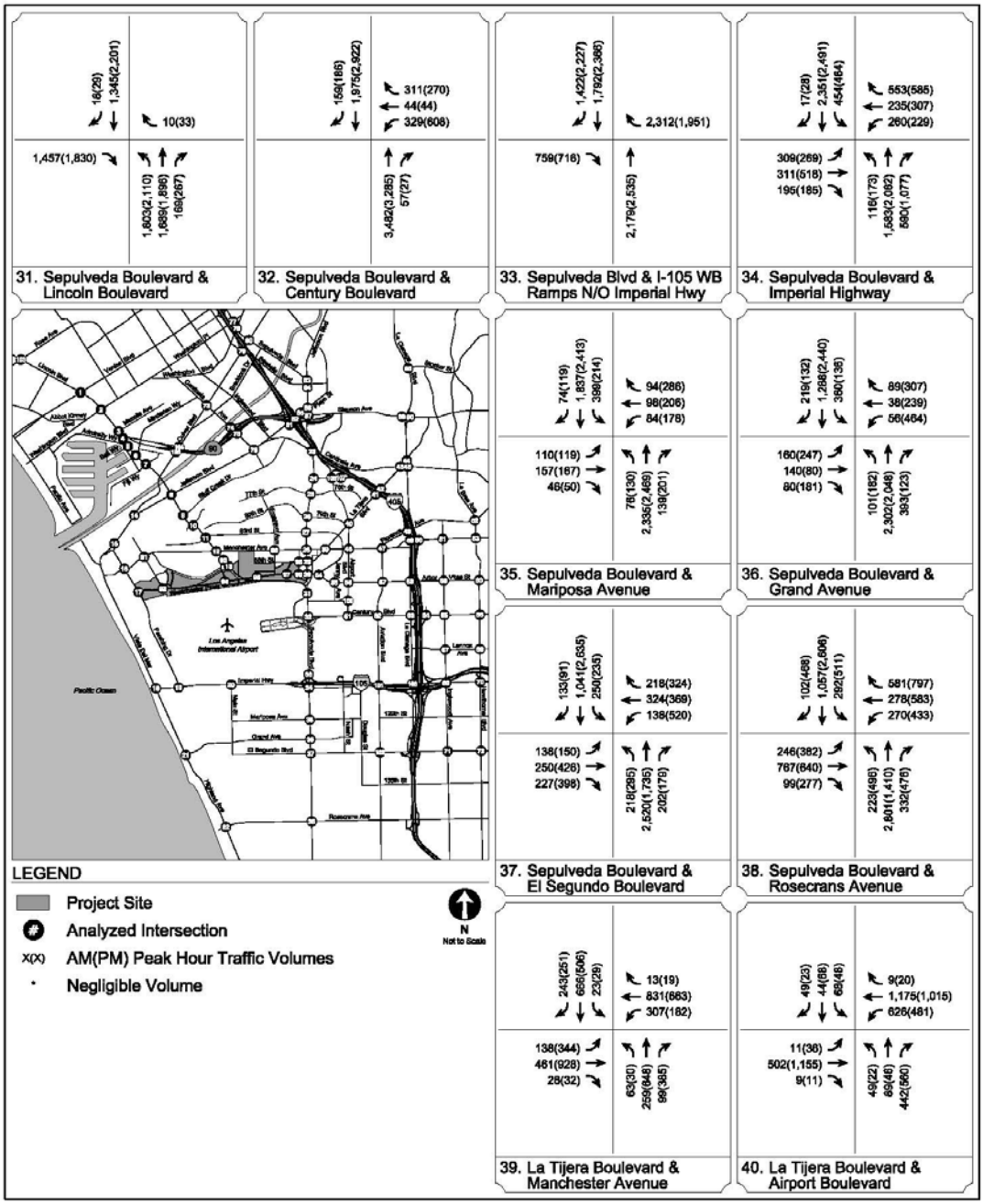
FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2022)
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 17 B



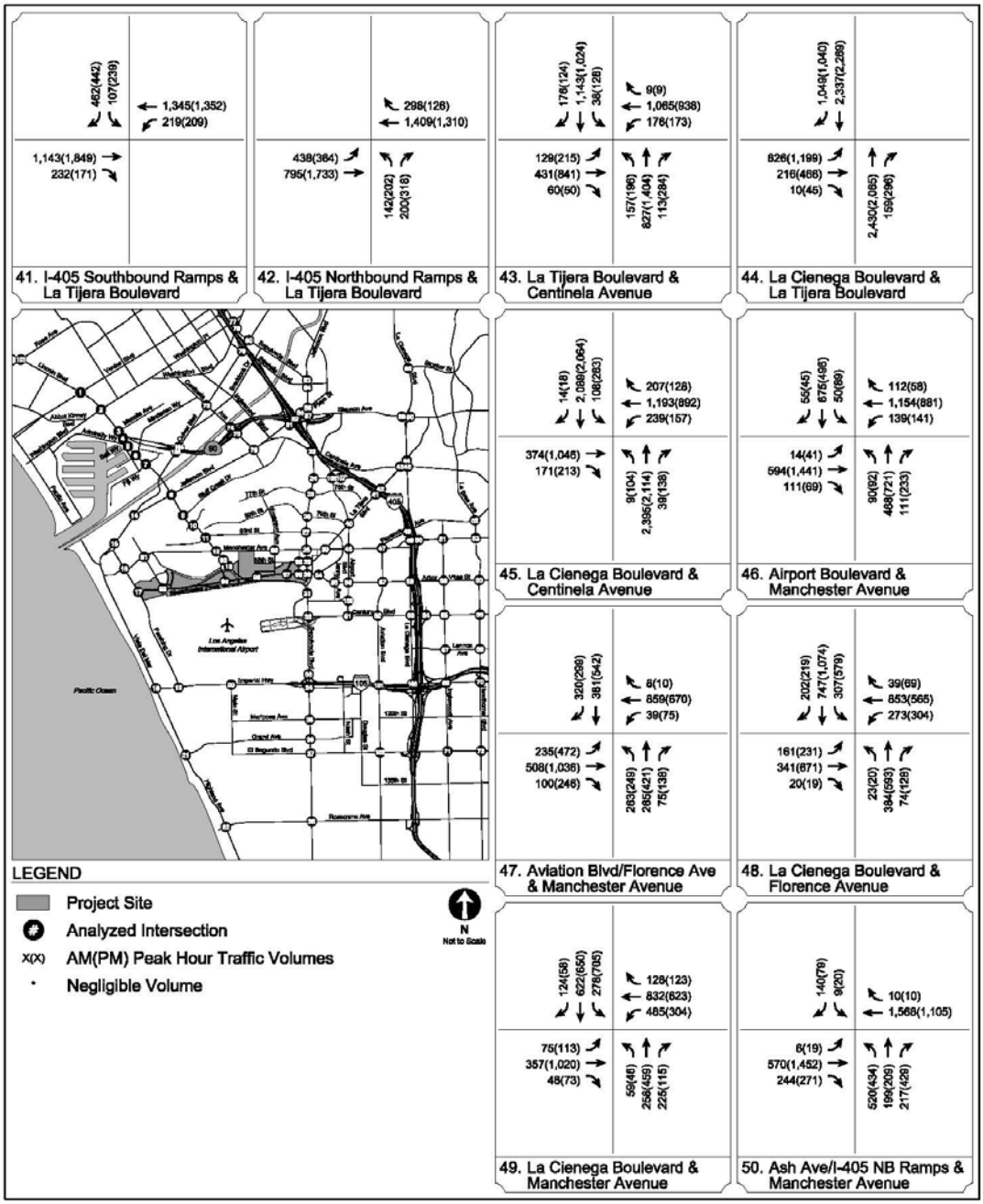
FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2022)
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 17 C



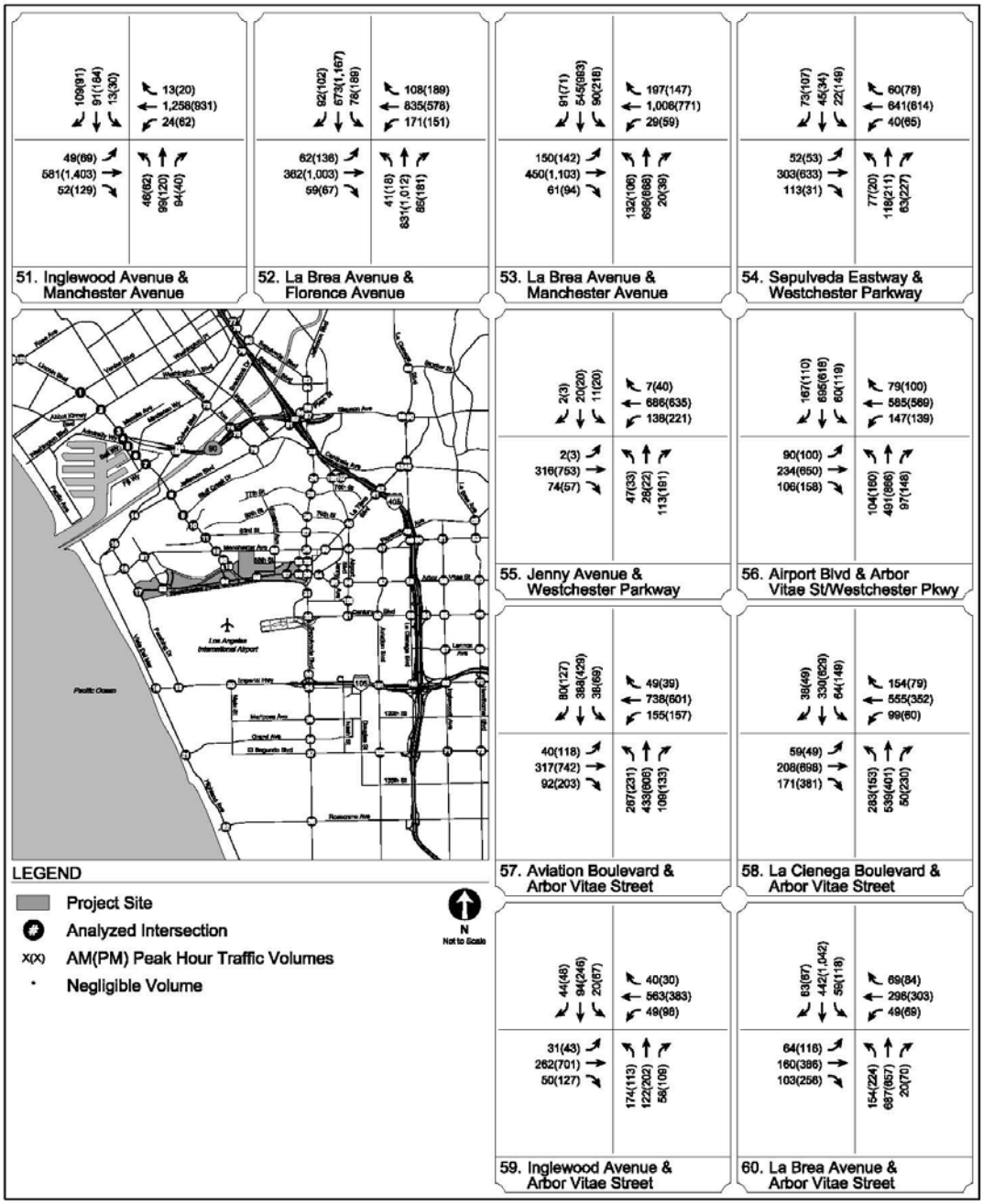
FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2022)
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 17 D



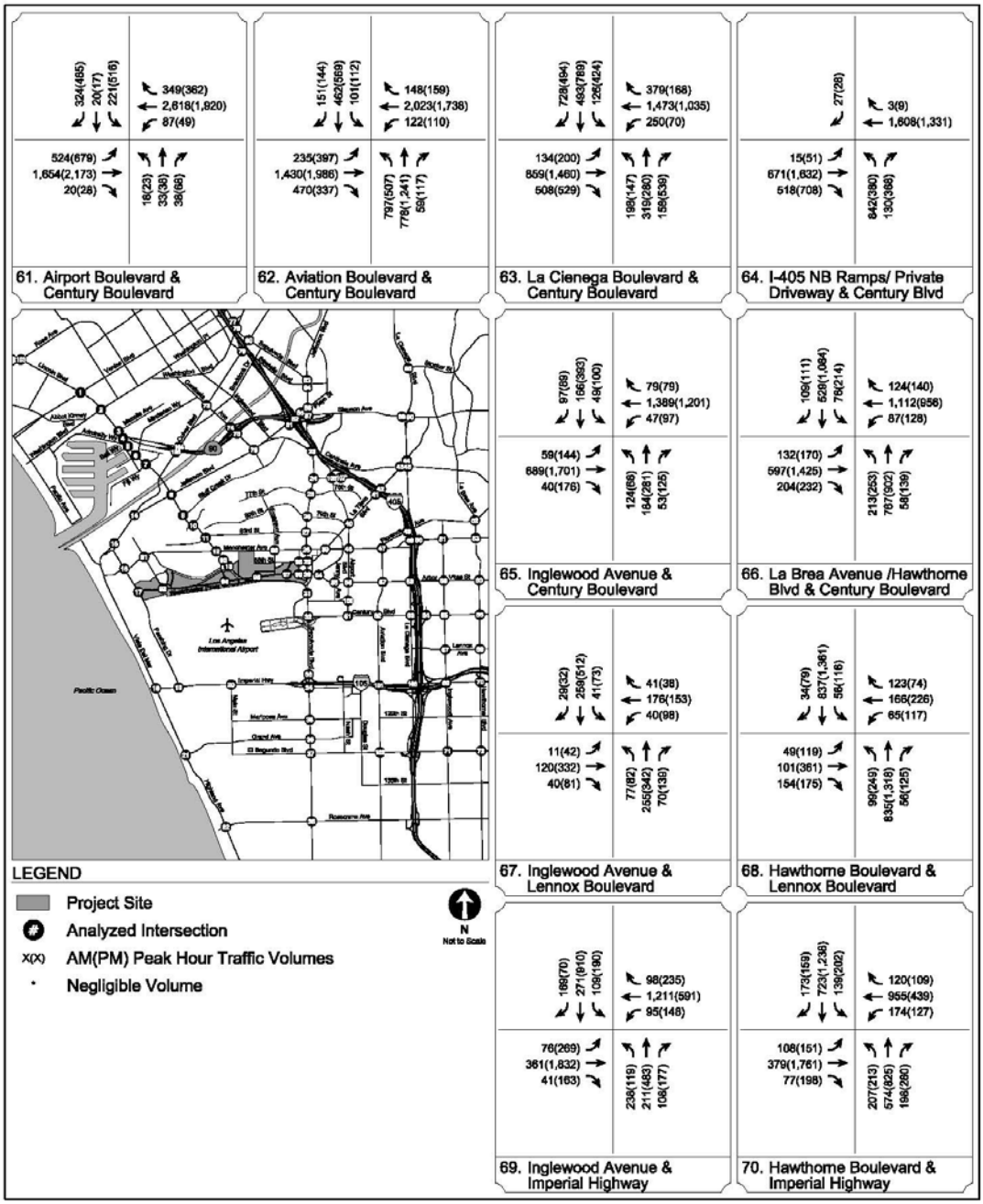
FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2022)
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 17 E



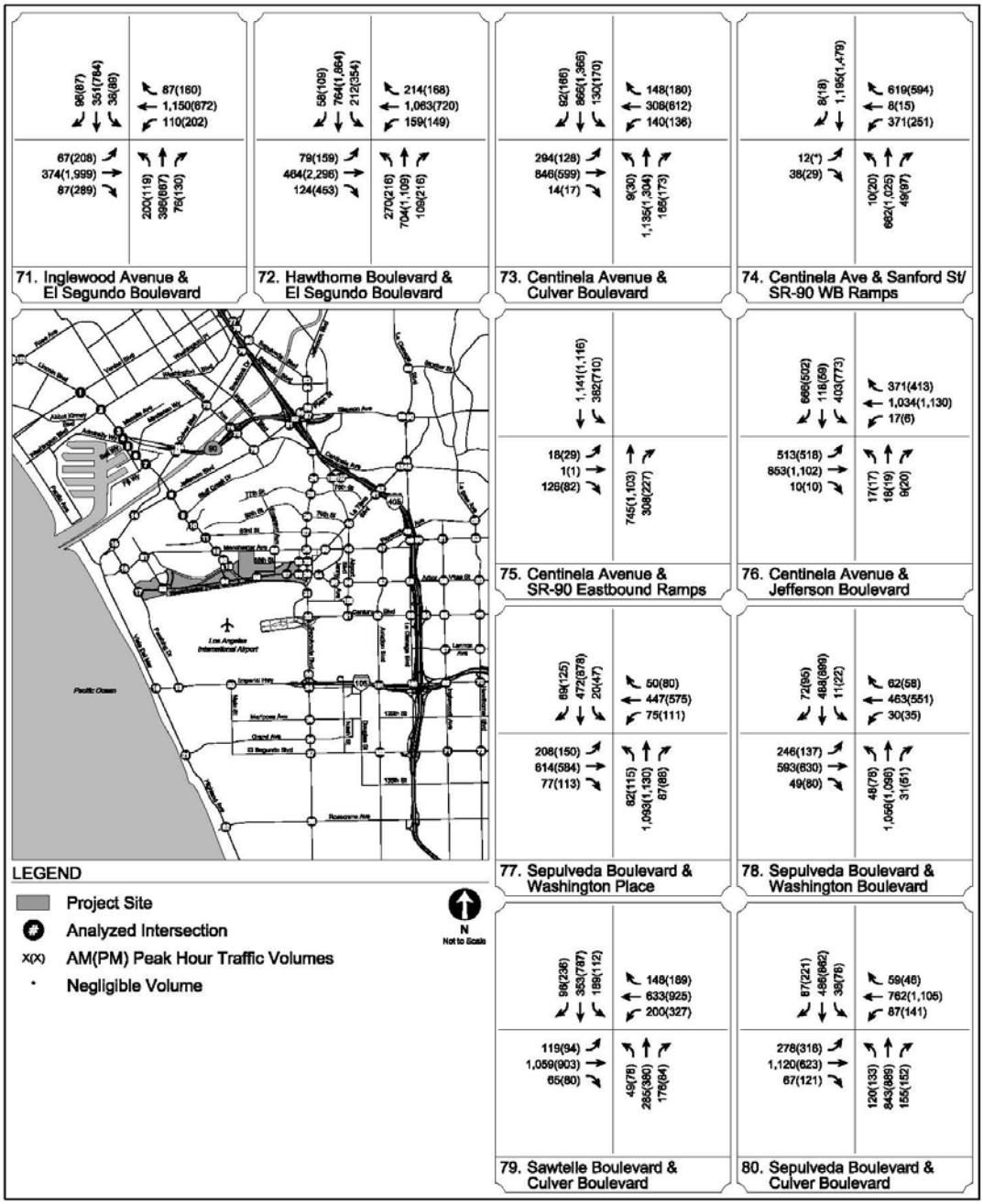
FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2022)
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 17 F



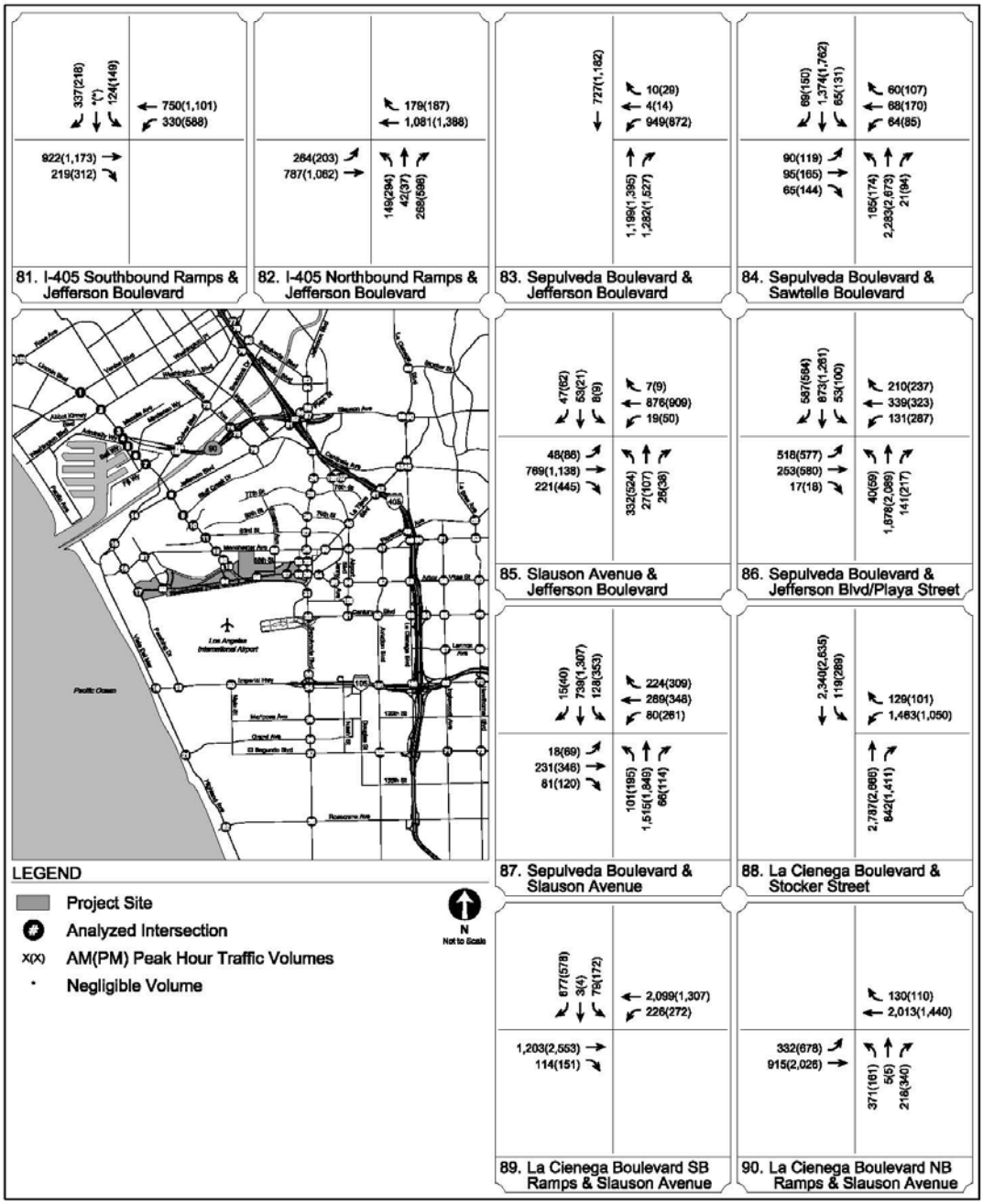
FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2022)
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 17 G



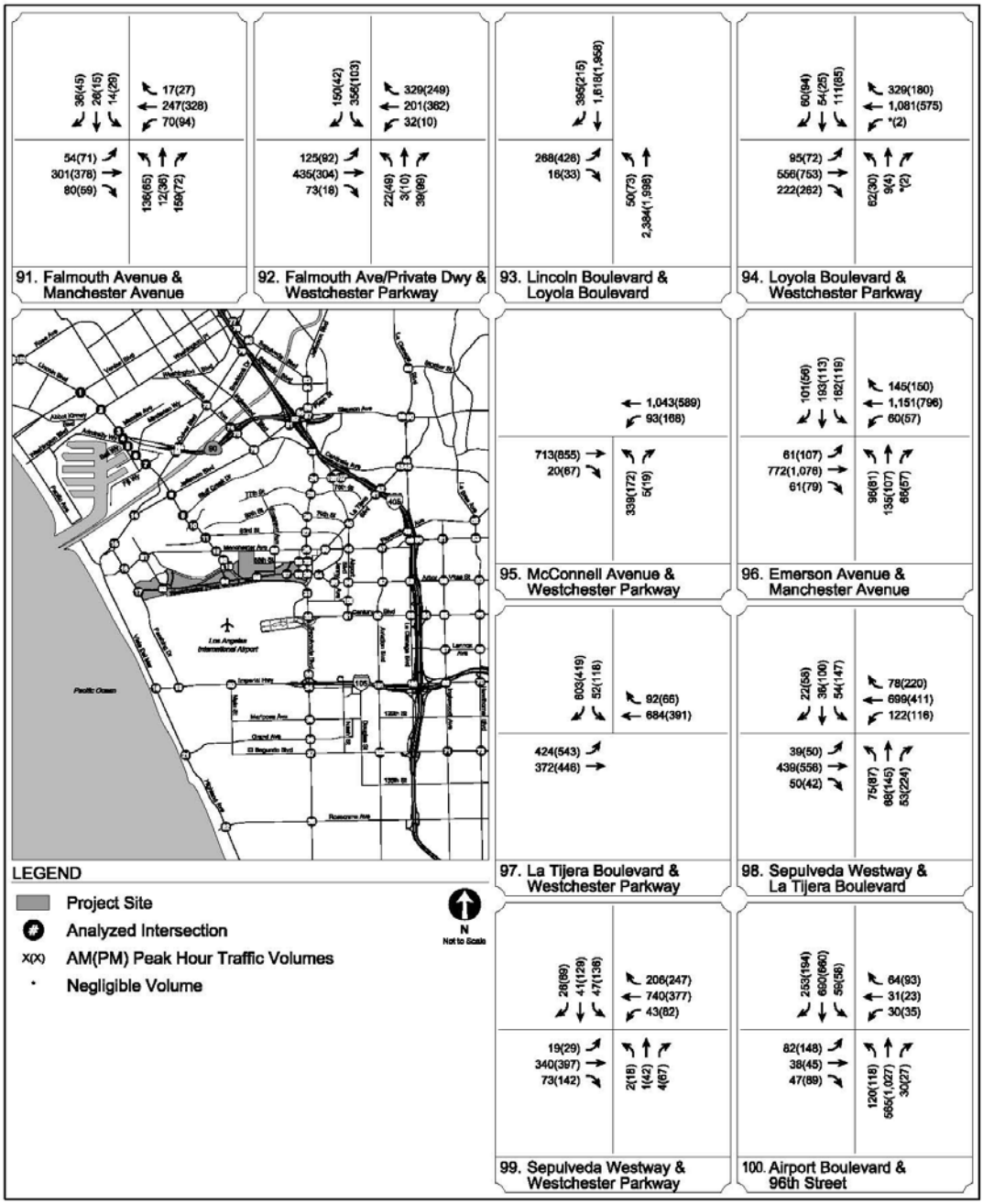
FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2022)
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 17 H



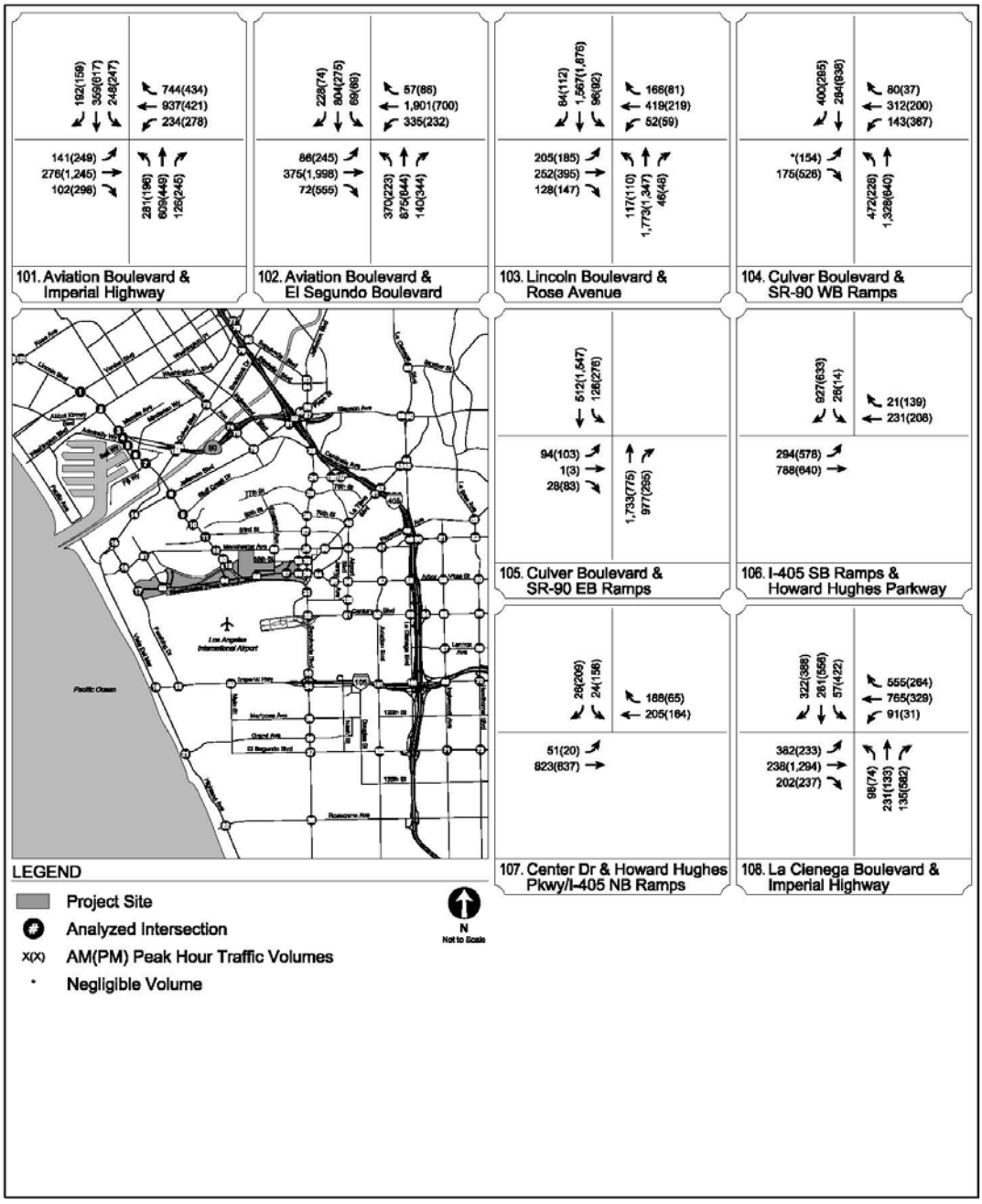
FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2022)
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 17 I



FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2022)
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 17 J



FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2022)
INTERSECTION PEAK HOUR TRAFFIC VOLUMES

FIGURE 17 K

Revise the Future with Project Conditions (Year 2022) section of Appendix C Culver City Supplemental Analysis of Appendix E Traffic Study as follows:

FUTURE WITH PROJECT CONDITIONS (YEAR 2022)

After discussions with Culver City staff, a new condition of approval and Project Design Feature was developed. The condition of approval would consist of the installation of triple left-turn lanes for the eastbound Jefferson Boulevard approach to northbound Sepulveda Boulevard, including associated signage and traffic signal improvements. The improvement would provide two left-turn lanes, one shared left-turn/through lane, and one shared through/right-turn lane in the eastbound direction. East/west split signal phasing and necessary traffic signal indications would be installed, pavement would be restriped, and signage would be enhanced to reflect the change. The improvement would have the effect of increasing capacity to the left-turn movement while decreasing through capacity onto Playa Street, which is not designed or desired to handle the volume of traffic it currently experiences. Table C-3 summarizes the operation of this intersection under Existing and Future conditions with the implementation of the improvement. As shown, the improvement would improve traffic conditions at this intersection.

Add Table C-3 to Appendix C Culver City Supplemental Analysis of Appendix E Traffic Study as follows:

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TABLE C-3
SEPULVEDA BOULEVARD & JEFFERSON BOULEVARD & PLAYA STREET
INTERSECTION ANALYSIS

No.	Intersection	Peak Hour	Existing / Future without Project		Existing / Future with Project		-	-	Existing / Future with Project with Condition of Approval (Project Design Feature)		-	-
			V/C	LOS	V/C	LOS	Δ V/C	Exceed Alternative Threshold	V/C	LOS	Δ V/C	Exceed Alternative Threshold
86.	Existing Conditions (Year 2012)	A.M.	0.695	B	0.699	B	0.004	NO	0.663	B	-0.032	NO
-	-	P.M.	0.875	D	0.891	D	0.016	NO	0.842	D	-0.033	NO
86.	Future Conditions (Year 2022)	A.M.	0.771	C	0.775	C	0.004	NO	0.727	C	-0.044	NO
-	-	P.M.	0.991	E	1.007	F	0.016	**YES**	0.952	E	-0.039	NO

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Revise the CMP Freeway Analysis subsection of the Alternative 2- No Project Alternative section of Appendix F Project Alternatives of Appendix E Traffic Study as follows:

ALTERNATIVE 2 – NO PROJECT ALTERNATIVE (PLANNED DEVELOPMENT)

CMP Freeway Analysis

Alternative 2 would add 150 or more peak hour trips to four of the freeway monitoring locations in either direction. Table F-7 summarizes the results of the CMP freeway location analysis for the Existing with Alternative 2 (year 2012) conditions and Table F-8 summarizes the results of the analysis for the Future with Alternative 2 (year 2022) conditions. ~~As shown in Tables F-7 and F-8, one of the freeway monitoring locations would be impacted by Alternative 2 traffic under both Existing and Future conditions before and after mitigation during the afternoon peak hour, one would be impacted by Alternative 2 traffic under Future conditions before and after mitigation during the morning peak hour, and one would be impacted by Alternative 2 traffic under Future conditions before and after mitigation during the afternoon peak hour.~~ As shown in Table F-7, none of the freeway monitoring locations would be impacted by Alternative 2 traffic under Existing conditions. As shown in Table F-8, I-405 north of Inglewood Avenue would be impacted by Alternative 2 traffic under Future conditions, before and after mitigation, in the northbound direction during the morning peak hour. The proposed Project's CMP freeway impacts would be greater under Alternative 2 compared to no impacts under the Project.

Revise the CMP Freeway Analysis subsection of the Alternative 4- Reduced Retail Alternative section of Appendix F Project Alternatives of Appendix E Traffic Study as follows:

ALTERNATIVE 4 – REDUCED RETAIL ALTERNATIVE

CMP Freeway Analysis

Alternative 4 would add 150 or more peak hour trips to two of the freeway monitoring locations in either direction. Table F-23 summarizes the results of the CMP freeway location analysis for the Existing with Alternative 4 (year 2012) conditions and Table F-24 summarizes the results of the analysis for the Future with Alternative 4 (year 2022) conditions. ~~As shown in Tables F-23 and F-24, one of the freeway monitoring locations (I-105 East of Sepulveda Boulevard) would be impacted by Alternative 4 traffic under both Existing and Future conditions, before and after mitigation. This is a greater impact than projected under Project conditions.~~ As shown in Tables F-23 and F-24, none of the freeway monitoring locations would be impacted by Alternative 4 traffic under Existing or Future conditions. This is the same as under Project conditions.

Revise Tables F-7, F-8, F-23, and F-24 of Appendix F Project Alternatives of Appendix E Traffic Study as follows:

TABLE F-7
EXISTING WITH ALTERNATIVE 2 CONDITIONS (YEAR 2012)
CMP FREEWAY SIGNIFICANT IMPACT ANALYSIS

Freeway Segment	Direction	Number of Lanes [a]	Capacity	Existing			Existing with Alternative 2					Existing with Alternative 2 with Mitigation				
				Volume	V/C	LOS	Volume	V/C	LOS	Δ V/C	Impact	Volume	V/C	LOS	Δ V/C	Impact
A.M. Peak Hour																
I-405	~~NB~~	~~4.5~~	~~9,000~~	~~8,524~~	~~0.947~~	~~E~~	~~8,593~~	~~0.955~~	~~E~~	~~0.008~~	~~NO~~	~~8,591~~	~~0.955~~	~~E~~	~~0.008~~	~~NO~~
North of Venice Boulevard	NB	5	10,000	8,524	0.852	D	8,593	0.859	D	0.007	NO	8,591	0.859	D	0.007	NO
	SB	5.5	11,000	7,295	0.663	C	7,589	0.690	C	0.027	NO	7,577	0.689	C	0.026	NO
I-405	NB	4.5	9,000	8,350	0.928	D	8,556	0.951	E	0.023	NO	8,548	0.950	E	0.022	NO
North of Inglewood Avenue	SB	4.5	9,000	6,113	0.679	C	6,161	0.685	C	0.006	NO	6,160	0.684	C	0.005	NO
I-105	EB	3	6,000	2,936	0.489	B	3,019	0.503	B	0.014	NO	3,017	0.503	B	0.014	NO
East of Sepulveda Boulevard	~~WB~~	~~2~~	~~4,000~~	~~5,014~~	~~1.254~~	~~F(1)~~	~~5,367~~	~~1.342~~	~~F(1)~~	~~0.088~~	~~**YES**~~	~~5,352~~	~~1.338~~	~~F(1)~~	~~0.084~~	~~**YES**~~
	WB	3	6,000	5,014	0.836	D	5,367	0.895	D	0.059	NO	5,352	0.892	D	0.056	NO
I-105	~~EB~~	~~3.5~~	~~7,000~~	~~5,330~~	~~0.761~~	~~C~~	~~5,383~~	~~0.769~~	~~C~~	~~0.008~~	~~NO~~	~~5,382~~	~~0.769~~	~~C~~	~~0.008~~	~~NO~~
East of Crenshaw Boulevard	~~WB~~	~~3.5~~	~~7,000~~	~~6,368~~	~~0.910~~	~~D~~	~~6,594~~	~~0.942~~	~~E~~	~~0.032~~	~~NO~~	~~6,585~~	~~0.941~~	~~E~~	~~0.031~~	~~NO~~
	EB	4.5	9,000	5,330	0.592	C	5,383	0.598	C	0.006	NO	5,382	0.598	C	0.006	NO
	WB	4	8,000	6,368	0.796	D	6,594	0.824	D	0.028	NO	6,585	0.823	D	0.027	NO
P.M. Peak Hour																
I-405	~~NB~~	~~4.5~~	~~9,000~~	~~7,070~~	~~0.786~~	~~D~~	~~7,368~~	~~0.819~~	~~D~~	~~0.033~~	~~NO~~	~~7,277~~	~~0.809~~	~~D~~	~~0.023~~	~~NO~~
North of Venice Boulevard	NB	5	10,000	7,070	0.707	C	7,368	0.737	C	0.030	NO	7,277	0.728	C	0.021	NO
	SB	5.5	11,000	8,256	0.751	C	8,367	0.761	C	0.010	NO	8,365	0.760	C	0.009	NO
I-405	NB	4.5	9,000	7,281	0.809	D	7,359	0.818	D	0.009	NO	7,357	0.817	D	0.008	NO
North of Inglewood Avenue	SB	4.5	9,000	7,312	0.812	D	7,521	0.836	D	0.024	NO	7,513	0.835	D	0.023	NO
I-105	EB	3	6,000	3,451	0.575	C	3,809	0.635	C	0.060	NO	3,796	0.633	C	0.058	NO
East of Sepulveda	~~WB~~	~~2~~	~~4,000~~	~~3,479~~	~~0.870~~	~~D~~	~~3,613~~	~~0.903~~	~~D~~	~~0.033~~	~~NO~~	~~3,610~~	~~0.903~~	~~D~~	~~0.033~~	~~NO~~

TABLE F-7
EXISTING WITH ALTERNATIVE 2 CONDITIONS (YEAR 2012)
CMP FREEWAY SIGNIFICANT IMPACT ANALYSIS

Freeway Segment	Direction	Number of Lanes [a]	Capacity	Existing			Existing with Alternative 2					Existing with Alternative 2 with Mitigation				
				Volume	V/C	LOS	Volume	V/C	LOS	Δ V/C	Impact	Volume	V/C	LOS	Δ V/C	Impact
Boulevard																
	WB	3	6,000	3,479	0.580	C	3,613	0.602	C	0.022	NO	3,610	0.602	C	0.022	NO
I-105	~~EB~~	~~3.5~~	~~7,000~~	~~5,598~~	~~0.800~~	~~D~~	~~5,827~~	~~0.832~~	~~D~~	~~0.032~~	~~NO~~	~~5,819~~	~~0.831~~	~~D~~	~~0.031~~	~~NO~~
East of Crenshaw	~~WB~~	~~3.5~~	~~7,000~~	~~4,820~~	~~0.689~~	~~C~~	~~4,906~~	~~0.701~~	~~C~~	~~0.012~~	~~NO~~	~~4,904~~	~~0.701~~	~~C~~	~~0.012~~	~~NO~~
Boulevard																
	EB	4.5	9,000	5,598	0.622	C	5,827	0.647	C	0.025	NO	5,819	0.647	C	0.025	NO
	WB	4	8,000	4,820	0.603	C	4,906	0.613	C	0.010	NO	4,904	0.613	C	0.010	NO

TABLE F-8
FUTURE WITH ALTERNATIVE 2 CONDITIONS (YEAR 2022)
CMP FREEWAY SIGNIFICANT IMPACT ANALYSIS

Freeway Segment	Direction	Number of Lanes [a]	Capacity	Future without Project			Future with Alternative 2					Future with Alternative 2 with Mitigation				
				Volume	V/C	LOS	Volume	V/C	LOS	Δ V/C	Impact	Volume	V/C	LOS	Δ V/C	Impact
A.M. Peak Hour																
I-405	~~NB~~	~~4.5~~	~~9,000~~	~~9,317~~	~~1.035~~	~~F(0)~~	~~9,386~~	~~1.043~~	~~F(0)~~	~~0.008~~	~~NO~~	~~9,384~~	~~1.043~~	~~F(0)~~	~~0.008~~	~~NO~~
North of Venice Boulevard	NB	5	10,000	9,317	0.932	E	9,386	0.939	E	0.007	NO	9,384	0.938	E	0.006	NO
	SB	5.5	11,000	7,973	0.725	C	8,267	0.752	C	0.027	NO	8,255	0.750	C	0.025	NO
I-405	NB	4.5	9,000	9,127	1.014	F(0)	9,333	1.037	F(0)	0.023	**YES**	9,325	1.036	F(0)	0.022	**YES**
North of Inglewood Avenue	SB	4.5	9,000	6,682	0.742	C	6,730	0.748	C	0.006	NO	6,729	0.748	C	0.006	NO
I-105	EB	3	6,000	3,209	0.535	B	3,292	0.549	C	0.014	NO	3,290	0.548	C	0.013	NO
East of Sepulveda Boulevard	~~WB~~	~~2~~	~~4,000~~	~~5,480~~	~~1.370~~	~~F(2)~~	~~5,833~~	~~1.458~~	~~F(3)~~	~~0.088~~	~~YES~~	~~5,818~~	~~1.455~~	~~F(3)~~	~~0.085~~	~~YES~~
	WB	3	6,000	5,480	0.913	D	5,833	0.972	E	0.059	NO	5,818	0.970	E	0.057	NO
I-105	~~EB~~	~~3.5~~	~~7,000~~	~~5,826~~	~~0.832~~	~~D~~	~~5,879~~	~~0.840~~	~~D~~	~~0.008~~	~~NO~~	~~5,878~~	~~0.840~~	~~D~~	~~0.008~~	~~NO~~
East of Crenshaw Boulevard	~~WB~~	~~3.5~~	~~7,000~~	~~6,960~~	~~0.994~~	~~E~~	~~7,186~~	~~1.027~~	~~F(0)~~	~~0.033~~	~~YES~~	~~7,177~~	~~1.025~~	~~F(0)~~	~~0.031~~	~~YES~~
	EB	4.5	9,000	5,826	0.647	C	5,879	0.653	C	0.006	NO	5,878	0.653	C	0.006	NO
	WB	4	8,000	6,960	0.870	D	7,186	0.898	D	0.028	NO	7,177	0.897	D	0.027	NO
P.M. Peak Hour																
I-405	~~NB~~	~~4.5~~	~~9,000~~	~~7,728~~	~~0.859~~	~~D~~	~~8,026~~	~~0.892~~	~~D~~	~~0.033~~	~~NO~~	~~7,935~~	~~0.882~~	~~D~~	~~0.023~~	~~NO~~
North of Venice Boulevard	NB	5	10,000	7,728	0.773	D	8,026	0.803	D	0.030	NO	7,935	0.794	D	0.021	NO
	SB	5.5	11,000	9,024	0.820	D	9,135	0.830	D	0.010	NO	9,133	0.830	D	0.010	NO
I-405	NB	4.5	9,000	7,958	0.884	D	8,036	0.893	D	0.009	NO	8,034	0.893	D	0.009	NO
North of Inglewood Avenue	SB	4.5	9,000	7,992	0.888	D	8,201	0.911	D	0.023	NO	8,193	0.910	D	0.022	NO
I-105	EB	3	6,000	3,772	0.629	C	4,130	0.688	C	0.059	NO	4,117	0.686	C	0.057	NO

TABLE F-8
FUTURE WITH ALTERNATIVE 2 CONDITIONS (YEAR 2022)
CMP FREEWAY SIGNIFICANT IMPACT ANALYSIS

Freeway Segment	Direction	Number of Lanes [a]	Capacity	Future without Project			Future with Alternative 2					Future with Alternative 2 with Mitigation				
				Volume	V/C	LOS	Volume	V/C	LOS	Δ V/C	Impact	Volume	V/C	LOS	Δ V/C	Impact
East of Sepulveda Boulevard	~~WB~~	~~2~~	~~4,000~~	~~3,803~~	~~0.951~~	~~E~~	~~3,937~~	~~0.984~~	~~E~~	~~0.033~~	~~NO~~	~~3,934~~	~~0.984~~	~~E~~	~~0.033~~	~~NO~~
	WB	3	6,000	3,803	0.634	C	3,937	0.656	C	0.022	NO	3,934	0.656	C	0.022	NO
I-105	~~EB~~	~~4.5~~	~~9,000~~	~~6,119~~	~~0.680~~	~~C~~	~~6,348~~	~~0.705~~	~~C~~	~~0.025~~	~~NO~~	~~6,340~~	~~0.704~~	~~C~~	~~0.024~~	~~NO~~
East of Crenshaw Boulevard	~~WB~~	~~4~~	~~8,000~~	~~5,268~~	~~0.659~~	~~C~~	~~5,354~~	~~0.669~~	~~C~~	~~0.010~~	~~NO~~	~~5,352~~	~~0.669~~	~~C~~	~~0.010~~	~~NO~~
	EB	3.5	7,000	6,119	0.874	D	6,348	0.907	D	0.033	NO	6,340	0.906	D	0.032	NO
	WB	3.5	7,000	5,268	0.753	C	5,354	0.765	C	0.012	NO	5,352	0.765	C	0.012	NO

TABLE F-23
EXISTING WITH ALTERNATIVE 4 CONDITIONS (YEAR 2012)
CMP FREEWAY SIGNIFICANT IMPACT ANALYSIS

Freeway Segment	Direction	Number of Lanes [a]	Capacity	Existing			Existing with Alternative 4					Existing with Alternative 4 with Mitigation				
				Volume	V/C	LOS	Volume	V/C	LOS	Δ V/C	Impact	Volume	V/C	LOS	Δ V/C	Impact
A.M. Peak Hour																
I-405	~~NB~~	~~4.5~~	~~9,000~~	~~8,524~~	~~0.947~~	~~E~~	~~8,563~~	~~0.951~~	~~E~~	~~0.004~~	~~NO~~	~~8,562~~	~~0.951~~	~~E~~	~~0.004~~	~~NO~~
North of Venice Boulevard	NB	5	10,000	8,524	0.852	D	8,563	0.856	D	0.004	NO	8,562	0.856	D	0.004	NO
	SB	5.5	11,000	7,295	0.663	C	7,462	0.678	C	0.015	NO	7,455	0.678	C	0.015	NO
I-105	~~EB~~	~~3~~	~~6,000~~	~~2,936~~	~~0.489~~	~~B~~	~~2,983~~	~~0.497~~	~~B~~	~~0.008~~	~~NO~~	~~2,981~~	~~0.497~~	~~B~~	~~0.008~~	~~NO~~
East of Sepulveda Boulevard	~~WB~~	~~2~~	~~4,000~~	~~5,014~~	~~1.254~~	~~F(1)~~	~~5,215~~	~~1.304~~	~~F(1)~~	~~0.050~~	~~YES~~	~~5,206~~	~~1.302~~	~~F(1)~~	~~0.048~~	~~YES~~
	EB	3.5	7,000	2,936	0.419	B	2,983	0.426	B	0.007	NO	2,981	0.426	B	0.007	NO
	WB	3.5	7,000	5,014	0.716	C	5,215	0.745	C	0.029	NO	5,206	0.744	C	0.028	NO
P.M. Peak Hour																
I-405	~~NB~~	~~4.5~~	~~9,000~~	~~7,070~~	~~0.786~~	~~D~~	~~7,236~~	~~0.804~~	~~D~~	~~0.018~~	~~NO~~	~~7,230~~	~~0.803~~	~~D~~	~~0.017~~	~~NO~~
North of Venice Boulevard	NB	5	10,000	7,070	0.707	C	7,236	0.724	C	0.017	NO	7,230	0.723	C	0.016	NO
	SB	5.5	11,000	8,256	0.751	C	8,302	0.755	C	0.004	NO	8,300	0.755	C	0.004	NO
I-105	~~EB~~	~~3~~	~~6,000~~	~~3,451~~	~~0.575~~	~~C~~	~~3,651~~	~~0.609~~	~~C~~	~~0.034~~	~~NO~~	~~3,643~~	~~0.607~~	~~C~~	~~0.032~~	~~NO~~
East of Sepulveda Boulevard	~~WB~~	~~2~~	~~4,000~~	~~3,479~~	~~0.870~~	~~D~~	~~3,534~~	~~0.884~~	~~D~~	~~0.014~~	~~NO~~	~~3,532~~	~~0.883~~	~~D~~	~~0.013~~	~~NO~~
	EB	3.5	7,000	3,451	0.493	B	3,651	0.522	B	0.029	NO	3,643	0.520	B	0.027	NO
	WB	3.5	7,000	3,479	0.497	B	3,534	0.505	B	0.008	NO	3,532	0.505	B	0.008	NO

TABLE F-24
FUTURE WITH ALTERNATIVE 4 CONDITIONS (YEAR 2022)
CMP FREEWAY SIGNIFICANT IMPACT ANALYSIS

Freeway Segment	Direction	Number of Lanes [a]	Capacity	Future without Project			Future with Alternative 4					Future with Alternative 4 with Mitigation				
				Volume	V/C	LOS	Volume	V/C	LOS	Δ V/C	Impact	Volume	V/C	LOS	Δ V/C	Impact
A.M. Peak Hour																
I-405	~~NB~~	~~4.5~~	~~9,000~~	~~9,317~~	~~1.035~~	~~F(0)~~	~~9,356~~	~~1.040~~	~~F(0)~~	~~0.005~~	~~NO~~	~~9,355~~	~~1.039~~	~~F(0)~~	~~0.004~~	~~NO~~
North of Venice Boulevard	NB	5	10,000	9,317	0.932	E	9,356	0.936	E	0.004	NO	9,355	0.936	E	0.004	NO
	SB	5.5	11,000	7,973	0.725	C	8,140	0.740	C	0.015	NO	8,133	0.739	C	0.014	NO
I-105	~~EB~~	~~3~~	~~6,000~~	~~3,209~~	~~0.535~~	~~B~~	~~3,256~~	~~0.543~~	~~C~~	~~0.008~~	~~NO~~	~~3,254~~	~~0.542~~	~~C~~	~~0.007~~	~~NO~~
East of Sepulveda Boulevard	~~WB~~	~~2~~	~~4,000~~	~~5,480~~	~~1.370~~	~~F(2)~~	~~5,681~~	~~1.420~~	~~F(2)~~	~~0.050~~	~~YES~~	~~5,672~~	~~1.418~~	~~F(2)~~	~~0.048~~	~~YES~~
	EB	3.5	7,000	3,209	0.458	B	3,256	0.465	B	0.007	NO	3,254	0.465	B	0.007	NO
	WB	3.5	7,000	5,480	0.783	D	5,681	0.812	D	0.029	NO	5,672	0.810	D	0.027	NO
P.M. Peak Hour																
I-405	~~NB~~	~~4.5~~	~~9,000~~	~~7,728~~	~~0.859~~	~~D~~	~~7,894~~	~~0.877~~	~~D~~	~~0.018~~	~~NO~~	~~7,888~~	~~0.876~~	~~D~~	~~0.017~~	~~NO~~
North of Venice Boulevard	NB	5	10,000	7,728	0.773	D	7,894	0.789	D	0.016	NO	7,888	0.789	D	0.016	NO
	SB	5.5	11,000	9,024	0.820	D	9,070	0.825	D	0.005	NO	9,068	0.824	D	0.004	NO
I-105	~~EB~~	~~3~~	~~6,000~~	~~3,772~~	~~0.629~~	~~C~~	~~3,972~~	~~0.662~~	~~C~~	~~0.033~~	~~NO~~	~~3,964~~	~~0.661~~	~~C~~	~~0.032~~	~~NO~~
East of Sepulveda Boulevard	~~WB~~	~~2~~	~~4,000~~	~~3,803~~	~~0.951~~	~~E~~	~~3,858~~	~~0.965~~	~~E~~	~~0.014~~	~~NO~~	~~3,856~~	~~0.964~~	~~E~~	~~0.013~~	~~NO~~
	EB	3.5	7,000	3,772	0.539	B	3,972	0.567	C	0.028	NO	3,964	0.566	C	0.027	NO
	WB	3.5	7,000	3,803	0.543	C	3,858	0.551	C	0.008	NO	3,856	0.551	C	0.008	NO

Revise the Description of Public Transit Lines section of Appendix K Public Transit Lines of Appendix E Traffic Study as follows:

The following provides a brief description of each of the bus lines providing service in the Project vicinity:

- ~~Metro Local 42/42A – Routes 42/42A are local lines that travel north-south on La Tijera Boulevard in the vicinity of the Project Site with average headways of 35 minutes during the weekday morning and afternoon peak hours. These lines travel from Downtown Los Angeles to Hawthorne and provide service to LAX, South Bay and Inglewood.~~

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Final Environmental Impact Report (Final EIR)

[State Clearinghouse No. 2012041003]

for

Los Angeles International Airport (LAX)
Northside Plan Update

Volume IV

Final EIR Appendices

Final Environmental Impact Report
This document (Volume IV), along with Volume III, comprises the second and final part of the Environmental Impact Report (EIR) for the LAX Northside Plan Update and supplements the Draft EIR for the LAX Northside Plan Update (Consisting of Volume I and Volume II), previously circulated for pubic review and comment. The LAX Northside Plan Update EIR is available for review at Los Angeles World Airports (LAWA) Administrative Offices, One World Way, Suite 218, Los Angeles, CA 90045.

City of Los Angeles
Los Angeles World Airports

December 2014

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Appendix A

LAX NORTHSIDE PLAN UPDATE

Original Comment Letters on the LAX Northside Plan Update

December 2014

Prepared for:

Los Angeles World Airports
One World Way
Los Angeles, California 90045

Prepared by:

URS Corporation
915 Wilshire Boulevard, Suite 700
Los Angeles, California 90017

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LETTER NO: LAXN-AS-01

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Edmund G. Brown Jr.
Governor

Ken Alex
Director

July 1, 2014

Lisa Trifiletti
Los Angeles World Airports
1 World Way
P.O. Box 92216
Los Angeles, CA 90009-2216

Subject: Los Angeles International Airport (LAX) Northside Plan Update
SCH#: 2012041003

Dear Lisa Trifiletti:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on June 30, 2014, and the state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

No. 1

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Document Details Report
State Clearinghouse Data Base

LETTER NO: LAXN-AS-01

SCH# 2012041003
Project Title Los Angeles International Airport (LAX) Northside Plan Update
Lead Agency Los Angeles World Airports

Type EIR Draft EIR

Description The proposed LAX Northside Plan Update will change development standards and uses for the LAX Northside area of the LAX Specific Plan to permit up to 2,320,000 sf of new employment, retail, restaurant, office, hotel, research and development, education, civic, airport support, recreation, and buffer uses on ~340 acres of land located north of LAX. The proposed project would also permit areas for open space for recreational and buffer uses and would allow uses and development rights to be transferred within limited areas of the site, not to exceed specified development, environmental, and design constraints. Implementation of the proposed Project may also include a street vacation of Cum Laude Avenue.

Lead Agency Contact

Name Lisa Trifiletti
Agency Los Angeles World Airports
Phone 424 646-5180 **Fax**
email
Address 1 World Way
P.O. Box 92216
City Los Angeles **State** CA **Zip** 90009-2216

Project Location

County Los Angeles
City Los Angeles, City of
Region
Lat / Long
Cross Streets Sepulveda Blvd. and Westchester Prkwy
Parcel No. 4118-013-915,4119-006-912,-913,4117-036-900,-901,-902,-903,4122-023-916,-917,-918,4122-022-92
Township 8, **Range** **Section** **Base**

Proximity to:

Highways
Airports LAX
Railways
Waterways
Schools Otis College of Art & Design, St. Bernard HS,
Land Use Vacant, fire station, child care, golf course, and animal quarantine/LAX-N Zone/ LAX Northside Plan Designation

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Conservation; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 7; Air Resources Board; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

Document Details Report
State Clearinghouse Data Base

LETTER NO: LAXN-AS-01

Date Received 05/15/2014 ***Start of Review*** 05/15/2014 ***End of Review*** 06/30/2014

DEPARTMENT OF TRANSPORTATION
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-9140
FAX (213) 897-1337
www.dot.ca.gov

Serious drought.
Help save water!

August 18, 2014

Ms. Lisa Trifiletti
Los Angeles World Airports
1 World Way, P.O. Box 92216
Los Angeles, CA 90009-2216

RE: Los Angeles International Airport
(LAX) Northside Plan Update
DEIR
Vic. LA-405, 105, 01
SCH # 2012041003
IGR/CEQA No. 140533NY/AL-DEIR

Dear Ms. Trifiletti:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed Project would set forth new regulations for future development occurring within the Northside area of the LAX Specific Plan, an area of approximately 340 acres north of LAX. The proposed Project is to develop up to 2,320,000 square feet of new development and is intended to create a vibrant sustainable center of employment, retail, restaurant, office, hotel, research and development, education, civic, airport support, recreation and buffer uses that support the need of surrounding communities and LAWA. No. 1

We appreciate the opportunity to meet with the Lead Agency and the consultants on July 15, 2014. In that meeting, we understood that the Lead Agency would follow Caltrans suggested Guide for the Preparation of Traffic Impact Studies. Caltrans, as the State agency responsible for planning, operations, and maintenance of State highways, shares similar transportation goals with the Lead Agency. In the spirit of mutual and collaborative planning, we offer our expertise in the areas of transportation modeling, mainline freeway analysis, system and corridor planning, environmental and community impact assessment, as well as identifying critical operational deficiencies affecting freeway congestion, speed, and delay. No. 2

The Project Trip Percentages at Caltrans Facilities submitted to Caltrans on July 30, 2014 was low according to Caltrans modeling office experience. The select link calculations may assume that, though consultant does not show it, the conditions on the Freeway system are extremely congested that it diverts trips to the arterial system. The SCAG model shows that the congestion No. 3

on the arterial system (particularly, Sepulveda and Lincoln) is extremely heavy, and thus the proportion diverted to the arterial system (i.e. 7% on I-405 North of SR-90 versus 23%) understates the use of the freeway system by trips originating in the study area. Perhaps, model assumptions need to be calibrated. No. 3

The 2035 plan horizon year projection needs to be more conservative. The SCAG 2012 Regional Transportation Plan Model shows the I-405, particularly on the southbound side in 2035, operating at LOS F0 or worse. The northbound side during the same time period is also operating at LOS F0 or worse for a good portion of the segments north of I-105. The proportion of trips using the freeway versus the arterial system understates utilization of the freeway system, and Lincoln Blvd North of Manchester Boulevard is at LOS E devolving to LOS F by the time it reaches Jefferson Boulevard. As a general rule N/S circulation within the area on both arterials and the freeways is heavily congested. No. 4 No. 5

In the Appendix E, Caltrans Analysis from the Traffic Study prepare in May 2014, many of the freeway segments show Level of Service (LOS) C and D in 2012 (Table E-2). However, when Caltrans verified the 2014 traffic data from PeMS, many of the freeway segments are operating at LOS F. We would like to bring this to your attention that the report may need to use the most recent traffic data to reflect the accuracy of the report according to CEQA. No. 6

Even when using the 2012 traffic data (V/C) in Table E-2 with the congested freeway calculating at LOS C or D and causing the freeway operating at unstable condition, Caltrans suggests the Lead Agency to use the speed or other measurement to calculate LOS other than V/C. Nevertheless, the end result in LOS must match the reality in order to obtain accurate data for the public to review. No. 7

For Table E-15 Off-Ramp Evaluation, capacity of the off-ramp should be calculated by the actual length of the off-ramp between the terminuses to the gore point with 30 feet per car. The demand of the off-ramp should be calculated from the traffic counts, actual signal timing, % of truck assignment on the ramp with passenger car equivalent factor of 3.0, generally speaking. The capacity and demand provided in the table needs to be conservative and referenced. Typically, a queuing analysis of the off-ramps in the project vicinity should utilize the Highway Capacity Manual (HCM) 85th percentile queuing methodology with the actual signal timing at the ramps' termini. Many of the existing off-ramps are at or over capacity. Caltrans would like to continue working with the lead agency to properly provide accurate queuing analysis for the off-ramps. No. 8

For Fair Share Calculation submitted on July 30, 2014, the existing freeway LOS should be used rather than 2035 freeway LOS. The freeway segments that are not be able to maintain the existing Measures of Effectiveness (MOE) with the project traffic trips will be determined impacted. No. 9

Caltrans would like to working with the Lead Agency to complete the traffic analysis and identify any feasible traffic mitigation on the State facilities. If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 140533NY/AL-DEIR.

No. 10

Sincerely,

DIANNA WATSON
Branch Chief
Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

May 27, 2014

VIA EMAIL AND U.S. MAIL

Herb Glasgow
Chief of Airport Planning
Los Angeles World Aiports
1 World Way, Room 218B
Los Angeles, CA 90045

RE: PLANNING, POLICY & DEVELOPMENT REVIEW PROCESS

Dear Mr. Glasgow:

The Los Angeles County Metropolitan Transportation Authority (Metro) is a public agency that plans, constructs, operates, and funds transportation projects throughout Los Angeles County. Metro's plans and projects may be affected by proposed projects for which local jurisdictions are asked to issue a permit, license, certificate, or other entitlement for use. The purpose of this communication is to clarify the process by which we review proposed developments and policy documents for potential impacts on Metro's system and facilities, as well as the notifications we require in order to review relevant projects in a timely manner.

In fulfillment of its statutory obligations as the regional transit operator, regional transportation planning and programming agency, and Congestion Management Program Agency, Metro reviews and provides input on projects within Los Angeles County that may impact the region's mobility and transportation network, including potential impacts to Metro rights-of-way (ROWs), bus stops, transit facilities, station areas, and transit operations. We strive to encourage the safest possible conditions around our transit facilities, create synergies with surrounding developments, and support relevant plans and policies.

No. 1

To ensure that Metro has sufficient time and meaningful opportunity to comment, per Public Resources Code §21003.1(a), please notify Metro of all proposed projects that may impact our facilities and services as early in the planning or entitlement process as possible. We request notification, as detailed in the attached matrix, at the time of preapplication consultation, as suggested in CEQA Guidelines section 15060.5(b), or as soon as is practicable. In addition, Metro should receive Notices of Preparation (NOPs) for all projects requiring Environmental Impact Reports (EIRs). In our experience, early consultation can resolve potential problems that could otherwise arise in more serious forms later in the review process.

As Metro works to improve mobility and quality of life in Los Angeles County, we look forward to working with local agencies to ensure the best possible development and policy outcomes. Together, we can encourage projects that will be complementary to and supportive of the growing transportation system.

Should you have any questions regarding this communication, please contact Nick Saponara at SaponaraN@metro.net / 213-922-4313 or Marie Sullivan at SullivanMa@metro.net / 213-922-5667.

Sincerely,

Martha Welborne

Martha Welborne, FAIA
Chief Planning Officer

ATTACHMENT: NOTIFICATION MATRIX

DEVELOPMENT		
Notification Required	**Environmental Impact Reports**	All Environmental Impact Reports at the Notice of Preparation stage*
	Mitigated Negative Declarations, Negative Declarations, Categorical Exemptions, and all other documents	Within 500 feet of Metro ROW**
		Immediately adjacent to Metro bus stops
Notification NOT Required	Conditional Uses to permit the sale of alcoholic beverages or Wireless Telecommunication Facilities	
	Renovation projects and Changes of Use permits with limited exterior impacts	
	Tenant Improvement projects interior to the building	
	Additions of less than 500 square feet	
PLANNING/POLICY DOCUMENTS		
Notification Required	Updates to General Plan Land Use, Housing or Circulation/Transportation Elements	
	Specific Plans, TOD Overlays, Design Overlays within 500 feet of Metro ROW*	
	Streetscape Plans for streets where Metro Bus or Rail operates	
	Bicycle or Active Transportation Plans	
PUBLIC WORKS PROJECTS		
Notification Required	Installation of bicycle lanes where Metro Bus or Rail is present	
	Utilities and other public works projects (e.g. water pipeline projects, utility relocations) that cross or are adjacent to Metro ROW*	
	Significant roadway improvements with alterations to roadway configurations (e.g. street widening, road diets) where Metro Bus or Rail operates	

No. 1

* All development projects that require preparation of an Environmental Impact Report (EIR) shall be subject to the Congestion Management Program (CMP) Land Use Analysis Program and must incorporate a CMP Transportation Impact Analysis (TIA) into the EIR. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County," Appendix D.

**For notification purposes, Metro ROW is defined as an existing or planned fixed-guideway system including Metro Rail, Metro fixed-guideway buses, and Metro-owned railroad ROW operated by Metrolink or freight companies or reserved for future service. Geographic data detailing our ROW is available for download at: http://developer.metro.net/introduction/metro-row/row-download/

Please send all documents to: Development Review
Los Angeles County Metropolitan Transportation Authority (Metro)
One Gateway Plaza—Mail Stop 99-23-4
Los Angeles, CA 90012-2952

LETTER NO: LAXN-AR-02

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

July 17, 2014

Herb Glasgow
Chief of Airport Planning
City of Los Angeles, Los Angeles World Airports
1 World Way, Room 218B
Los Angeles, CA 90045

RE: LAX Northside Plan – Draft Environmental Impact Report

Dear Mr. Glasgow,

Thank you for the opportunity to comment on the proposed LAX Northside Plan. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (LACMTA) concerning issues that are germane to our agency's statutory responsibility in relation to our facilities and services that may be affected by the proposed project. No. 1

The Draft Environmental Impact Report (DEIR) suggests that intersection improvements would be made that would benefit Metro Bus Operations, and that two new buses would be provided for the Metro 115 bus line. The following comments relate to Metro Bus Operations, relative to the proposed project: No. 2

1. In addition to providing buses for Metro, the development may need to consider providing funding for operations of Line 115 on Manchester Avenue west of Sepulveda Bl. The description of Line 115 on page K-1 describes 10 minute peak period headways on Manchester Avenue in the vicinity of the project site, but the actual peak period headway is 30 to 45 minutes (excluding a brief period in the 7 AM hour westbound). Presently only one-third of Line 115 trips operate west of Sepulveda Boulevard to Playa del Rey, so buses only operate every 30 to 60 minutes near the project site (buses that terminate at Sepulveda Boulevard are called "shortline" buses). Extending some of the shortline trips on Line 115 would appear to meet a common goal of Metro and LAWA to serve new riders, and could attract more project-generated trips. Without funding the extension of some of the Line 115 shortline trips, the assumption that Line 115 will carry 66 project-generated trips is problematic, since most Line 115 trips do not operate west of Sepulveda Bl. No. 3

2. In Table 6 which is an inventory of existing transit service in the study area, please note that Line 42 no longer exists; it has been incorporated into Line 102 operating from the LAX City Bus Center to South Gate with different service levels than shown in the table. Additionally, Line 439 was cancelled when the Metro Expo Line opened in 2012. Table 6 also lists three routes under the Municipal Area Express (MAX) that should be removed, since MAX is no No. 4

longer providing service. Also the description of public transit lines (Section K) should be updated to reflect these changes

3. Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may Impact Metro bus lines. (For closures that last more than six months, Metro's Stops and Zones Department will also need to be notified at 213-922-5063). Other municipal bus operators may also be impacted and should be included in construction outreach efforts.

No. 4

No. 5

4. LACMTA encourages the installation of bus shelters, benches and other amenities that improve the transit rider experience. The City should consider requesting the installation of such amenities as part of the development of the site.

No. 6

5. Final design of bus stops and surrounding sidewalk area must be Americans with Disabilities Act (ADA) compliant and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development.

No. 7

Beyond impacts to Metro facilities and operations, LACMTA must also notify the applicant of state requirements. We appreciate the careful analysis that was done in the Draft EIR, but must reiterate the requirements as a formality. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County", Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).

2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.

3. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.

4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

No. 8

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria

above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

No. 8

If you have any questions regarding this response, please contact Marie Sullivan at 213-922-5667 or by email at SullivanMa@metro.net. LACMTA looks forward to reviewing the Final EIR. Please send it to the following address:

No. 9

LACMTA Development Review
One Gateway Plaza MS 99-23-4
Los Angeles, CA 90012-2952

Sincerely,

Marie Sullivan
Development Review Coordinator, Countywide Planning

Attachment: CMP Appendix D: Guidelines for CMP Transportation Impact Analysis

APPENDIX

D

GUIDELINES FOR CMP TRANSPORTATION IMPACT ANALYSIS

Important Notice to User: This section provides detailed travel statistics for the Los Angeles area which will be updated on an ongoing basis. Updates will be distributed to all local jurisdictions when available. In order to ensure that impact analyses reflect the best available information, lead agencies may also contact MTA at the time of study initiation. Please contact MTA staff to request the most recent release of "Baseline Travel Data for CMP TIAs."

D.1 OBJECTIVE OF GUIDELINES

The following guidelines are intended to assist local agencies in evaluating impacts of land use decisions on the Congestion Management Program (CMP) system, through preparation of a regional transportation impact analysis (TIA). The following are the basic objectives of these guidelines:

- Promote consistency in the studies conducted by different jurisdictions, while maintaining flexibility for the variety of project types which could be affected by these guidelines.
- Establish procedures which can be implemented within existing project review processes and without ongoing review by MTA.
- Provide guidelines which can be implemented immediately, with the full intention of subsequent review and possible revision.

These guidelines are based on specific requirements of the Congestion Management Program, and travel data sources available specifically for Los Angeles County. References are listed in Section D.10 which provide additional information on possible methodologies and available resources for conducting TIAs.

D.2 GENERAL PROVISIONS

Exhibit D-7 provides the model resolution that local jurisdictions adopted containing CMP TIA procedures in 1993. TIA requirements should be fulfilled within the existing environmental review process, extending local traffic impact studies to include impacts to the regional system. In order to monitor activities affected by these requirements, Notices of Preparation (NOPs) must be submitted to MTA as a responsible agency. Formal MTA approval of individual TIAs is not required.

The following sections describe CMP TIA requirements in detail. In general, the competing objectives of consistency & flexibility have been addressed by specifying standard, or minimum, requirements and requiring documentation when a TIA varies from these standards.

D.3 PROJECTS SUBJECT TO ANALYSIS

In general a CMP TIA is required for all projects required to prepare an Environmental Impact Report (EIR) based on local determination. A TIA is not required if the lead agency for the EIR finds that traffic is not a significant issue, and does not require local or regional traffic impact analysis in the EIR. Please refer to Chapter 5 for more detailed information.

CMP TIA guidelines, particularly intersection analyses, are largely geared toward analysis of projects where land use types and design details are known. Where likely land uses are not defined (such as where project descriptions are limited to zoning designation and parcel size with no information on access location), the level of detail in the TIA may be adjusted accordingly. This may apply, for example, to some redevelopment areas and citywide general plans, or community level specific plans. In such cases, where project definition is insufficient for meaningful intersection level of service analysis, CMP arterial segment analysis may substitute for intersection analysis.

D.4 STUDY AREA

The geographic area examined in the TIA must include the following, at a minimum:

- ❑ All CMP arterial monitoring intersections, including monitored freeway on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic).
- ❑ If CMP arterial segments are being analyzed rather than intersections (see Section D.3), the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
- ❑ Mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during either the AM or PM weekday peak hours.
- ❑ Caltrans must also be consulted through the Notice of Preparation (NOP) process to identify other specific locations to be analyzed on the state highway system.

If the TIA identifies no facilities for study based on these criteria, no further traffic analysis is required. However, projects must still consider transit impacts (Section D.8.4).

D.5 BACKGROUND TRAFFIC CONDITIONS

The following sections describe the procedures for documenting and estimating background, or non-project related traffic conditions. Note that for the purpose of a TIA, these background estimates must include traffic from all sources without regard to the exemptions specified in CMP statute (e.g., traffic generated by the provision of low and very low income housing, or trips originating outside Los Angeles County. Refer to Chapter 5, Section 5.2.3 for a complete list of exempted projects).

D.5.1 Existing Traffic Conditions. Existing traffic volumes and levels of service (LOS) on the CMP highway system within the study area must be documented. Traffic counts must

be less than one year old at the time the study is initiated, and collected in accordance with CMP highway monitoring requirements (see Appendix A). Section D.8.1 describes TIA LOS calculation requirements in greater detail. Freeway traffic volume and LOS data provided by Caltrans is also provided in Appendix A.

D.5.2 Selection of Horizon Year and Background Traffic Growth. Horizon year(s) selection is left to the lead agency, based on individual characteristics of the project being analyzed. In general, the horizon year should reflect a realistic estimate of the project completion date. For large developments phased over several years, review of intermediate milestones prior to buildout should also be considered.

At a minimum, horizon year background traffic growth estimates must use the generalized growth factors shown in Exhibit D-1. These growth factors are based on regional modeling efforts, and estimate the general effect of cumulative development and other socioeconomic changes on traffic throughout the region. Beyond this minimum, selection among the various methodologies available to estimate horizon year background traffic in greater detail is left to the lead agency. Suggested approaches include consultation with the jurisdiction in which the intersection under study is located, in order to obtain more detailed traffic estimates based on ongoing development in the vicinity.

D.6 PROPOSED PROJECT TRAFFIC GENERATION

Traffic generation estimates must conform to the procedures of the current edition of Trip Generation, by the Institute of Transportation Engineers (ITE). If an alternative methodology is used, the basis for this methodology must be fully documented.

Increases in site traffic generation may be reduced for existing land uses to be removed, if the existing use was operating during the year the traffic counts were collected. Current traffic generation should be substantiated by actual driveway counts; however, if infeasible, traffic may be estimated based on a methodology consistent with that used for the proposed use.

Regional transportation impact analysis also requires consideration of trip lengths. Total site traffic generation must therefore be divided into work and non-work-related trip purposes in order to reflect observed trip length differences. Exhibit D-2 provides factors which indicate trip purpose breakdowns for various land use types.

For lead agencies who also participate in CMP highway monitoring, it is recommended that any traffic counts on CMP facilities needed to prepare the TIA should be done in the manner outlined in Chapter 2 and Appendix A. If the TIA traffic counts are taken within one year of the deadline for submittal of CMP highway monitoring data, the local jurisdiction would save the cost of having to conduct the traffic counts twice.

D.7 TRIP DISTRIBUTION

For trip distribution by direct/manual assignment, generalized trip distribution factors are provided in Exhibit D-3, based on regional modeling efforts. These factors indicate Regional Statistical Area (RSA)-level tripmaking for work and non-work trip purposes.

(These RSAs are illustrated in Exhibit D-4.) For locations where it is difficult to determine the project site RSA, census tract/RSA correspondence tables are available from MTA.

Exhibit D-5 describes a general approach to applying the preceding factors. Project trip distribution must be consistent with these trip distribution and purpose factors; the basis for variation must be documented.

Local agency travel demand models disaggregated from the SCAG regional model are presumed to conform to this requirement, as long as the trip distribution functions are consistent with the regional distribution patterns. For retail commercial developments, alternative trip distribution factors may be appropriate based on the market area for the specific planned use. Such market area analysis must clearly identify the basis for the trip distribution pattern expected.

D.8 IMPACT ANALYSIS

CMP Transportation Impact Analyses contain two separate impact studies covering roadways and transit. Section Nos. D.8.1-D.8.3 cover required roadway analysis while Section No. D.8.4 covers the required transit impact analysis. Section Nos. D.9.1-D.9.4 define the requirement for discussion and evaluation of alternative mitigation measures.

D.8.1 Intersection Level of Service Analysis. The LA County CMP recognizes that individual jurisdictions have wide ranging experience with LOS analysis, reflecting the variety of community characteristics, traffic controls and street standards throughout the county. As a result, the CMP acknowledges the possibility that no single set of assumptions should be mandated for all TIAs within the county.

However, in order to promote consistency in the TIAs prepared by different jurisdictions, CMP TIAs must conduct intersection LOS calculations using either of the following methods:

- ❑ The Intersection Capacity Utilization (ICU) method as specified for CMP highway monitoring (see Appendix A); or
- ❑ The Critical Movement Analysis (CMA) / Circular 212 method.

Variation from the standard assumptions under either of these methods for circumstances at particular intersections must be fully documented.

TIAs using the 1985 or 1994 Highway Capacity Manual (HCM) operational analysis must provide converted volume-to-capacity based LOS values, as specified for CMP highway monitoring in Appendix A.

D.8.2 Arterial Segment Analysis. For TIAs involving arterial segment analysis, volume-to-capacity ratios must be calculated for each segment and LOS values assigned using the V/C-LOS equivalency specified for arterial intersections. A capacity of 800 vehicles per hour per through traffic lane must be used, unless localized conditions necessitate alternative values to approximate current intersection congestion levels.

D.8.3 Freeway Segment (Mainline) Analysis. For the purpose of CMP TIAs, a simplified analysis of freeway impacts is required. This analysis consists of a demand-to-capacity calculation for the affected segments, and is indicated in Exhibit D-6.

D.8.4 Transit Impact Review. CMP transit analysis requirements are met by completing and incorporating into an EIR the following transit impact analysis:

- ☐ Evidence that affected transit operators received the Notice of Preparation.
- ☐ A summary of existing transit services in the project area. Include local fixed-route services within a ¼ mile radius of the project; express bus routes within a 2 mile radius of the project, and; rail service within a 2 mile radius of the project.
- ☐ Information on trip generation and mode assignment for both AM and PM peak hour periods as well as for daily periods. Trips assigned to transit will also need to be calculated for the same peak hour and daily periods. Peak hours are defined as 7:30-8:30 AM and 4:30-5:30 PM. Both "peak hour" and "daily" refer to average weekdays, unless special seasonal variations are expected. If expected, seasonal variations should be described.
- ☐ Documentation of the assumption and analyses that were used to determine the number and percent of trips assigned to transit. Trips assigned to transit may be calculated along the following guidelines:
  - ➢ Multiply the total trips generated by 1.4 to convert vehicle trips to person trips;
  - ➢ For each time period, multiply the result by one of the following factors:

    3.5% of Total Person Trips Generated for most cases, except:

    10% primarily Residential within 1/4 mile of a CMP transit center
    15% primarily Commercial within 1/4 mile of a CMP transit center
    7% primarily Residential within 1/4 mile of a CMP multi-modal transportation center
    9% primarily Commercial within 1/4 mile of a CMP multi-modal transportation center
    5% primarily Residential within 1/4 mile of a CMP transit corridor
    7% primarily Commercial within 1/4 mile of a CMP transit corridor
    0% if no fixed route transit services operate within one mile of the project

  To determine whether a project is primarily residential or commercial in nature, please refer to the CMP land use categories listed and defined in Appendix E, ***Guidelines for New Development Activity Tracking and Self Certification.*** For projects that are only partially within the above one-quarter mile radius, the base rate (3.5% of total trips generated) should be applied to all of the project buildings that touch the radius perimeter.

- ☐ Information on facilities and/or programs that will be incorporated in the development plan that will encourage public transit use. Include not only the jurisdiction's TDM Ordinance measures, but other project specific measures.

D.10 REFERENCES

1. *Traffic Access and Impact Studies for Site Development: A Recommended Practice*, Institute of Transportation Engineers, 1991.
2. *Trip Generation*, 5th Edition, Institute of Transportation Engineers, 1991.
3. *Travel Forecast Summary: 1987 Base Model - Los Angeles Regional Transportation Study (LARTS)*, California State Department of Transportation (Caltrans), February 1990.
4. *Traffic Study Guidelines*, City of Los Angeles Department of Transportation (LADOT), July 1991.
5. *Traffic/Access Guidelines*, County of Los Angeles Department of Public Works.
6. *Building Better Communities*, Sourcebook, Coordinating Land Use and Transit Planning, American Public Transit Association.
7. *Design Guidelines for Bus Facilities*, Orange County Transit District, 2nd Edition, November 1987.
8. *Coordination of Transit and Project Development*, Orange County Transit District, 1988.
9. *Encouraging Public Transportation Through Effective Land Use Actions*, Municipality of Metropolitan Seattle, May 1987.

South Coast
Air Quality Management District
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(909) 396-2000 • www.aqmd.gov

E-Mailed: July 25, 2014 July 25, 2014
ltrifiletti@lawa.org

Ms. Lisa Trifiletti
Los Angeles World Airports, Capital Programming and Planning
Environmental and Land Use Planning
One World Way, Suite #218
Los Angeles, CA 90045

Review of the Draft Environmental Impact Report (Draft EIR) for the LAX Northside Plan Update Project

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the Lead Agency and should be incorporated into the revised Draft Environmental Impact Report (EIR) or Final EIR as appropriate. No. 1

Based on a review of the air quality analysis in the Draft EIR the SCAQMD staff is concerned that the potential health risk impacts from the proposed project are underestimated due to incorrect identification of receptors surrounding the project site. Also, the SCAQMD staff is concerned that the air dispersion modeling analysis used to identify the project's localized Nitrogen Dioxide (NO_2) impacts does not clearly demonstrate consistency with EPA approved methodologies. Therefore, the SCAQMD Staff recommends that the Lead Agency revise the health risk assessment (HRA) and air dispersion modeling analysis to address these concerns. Further, the SCAQMD staff recommends that the lead agency provide additional mitigation measures to minimize the project's significant regional construction and operational air quality impacts pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines. Details regarding these comments are attached to this letter. No. 2

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any No. 3

other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments. No. 3

Sincerely,

Ed Eckerle
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

EE:DG

LAC140521-04
Control Number

Health Risk Assessment

1. Based on the Excel file HRA Outputs.xls provided to the SCAQMD staff on a USB drive, the worker receptor with the highest carcinogenic health risk impact from operations, and construction and operation together is located at 369300 m, 3758000 m, Zone 11. However, based on Figure 6 of Appendix C of the Draft EIR and on Google Maps with imagery dated April 17, 2013, the property at this coordinate is an apartment complex. The carcinogenic health risk from the proposed project reported to this receptor is presented as 1.5 in one million in Table 4.2-12. The same table lists the carcinogenic health risk to the resident as 1.1 in one million. Since health risk estimates for workers are typically lower than residential receptors because of differences in exposure duration, it appears that the apartment complex should be presented as the residential maximum individual cancer risk (MICR). Carcinogenic health risk values for this receptor should be estimated using residential health risk factors (e.g., breathing rate and exposure values) and correct annual concentration adjustment factor (AFann) and compared to carcinogenic health risk from other residential receptors to ensure that the residential MICR is correctly reported in the Final EIR. See comment # 2 below for additional details. No. 4

2. Table 19 in Appendix C of the Draft EIR shows that during construction an AFann factor of one (1) was used for residential and sensitive receptors and 4.20 for worker receptors. Based on the input files provided to SCAQMD staff on a USB drive (e.g., LAX Construction Vol XQ ALL METDATA.ami) variable emission factors were used to limit emissions to between 8:00 am and 4:00 pm, Monday through Saturday. Based on Table 2C of the SCAQMD Permit Application Package "L", Revised July 11, 2008, the AFann for a source operation eight hours per day, six days per week should be 3.5. Therefore, the operational carcinogenic health risk to residential and sensitive receptors is under estimated. The health risk from construction should be recalculated with an AFann of 3.5 for residential, sensitive and worker receptors in the Final EIR. No. 5

3. Health risk values (i.e, carcinogenic health risk, non carcinogenic hazard indices, cancer burden) were estimated within Access. Because no documentation was provided on the sources of tables and queries used were provided, verification of health risk values generated is very difficult and time consuming. The Final EIR and all future projects with analysis prepared with Access should include detailed documentation that identifies the source of data in tables (spreadsheets, output files, etc.), the units of variables (e.g., (ug/m3)/(1 g/s), lb/day, etc.) manipulation of data using queries, etc. No. 6

4. Table 19 in Appendix C of the Draft EIR shows that during operation an AFann of 1.00 was used for residential and sensitive receptors exposed over a 24-hour period and 4.20 was used for workers exposed over a 24-hour period. Since all variable emission factors are one in the input files provided to SCAQMD staff on a USB drive (e.g., LAX Operational XQ ALL METDATA.ami), 1.0 should be used for all receptors (residential, sensitive and worker). Since using an AFann of 4.20 for operational workers is conservative, no change would be required to this EIR. This information is provided for correction in future projects by the Lead Agency. No. 7

Evaluation of Health Risk Impacts from the Airport on the Proposed Project

5. The Lead Agency determined that a maximum acute non-cancer health hazard index (HI) of 3.0 identified in the LAX Specific Plan Amendment Study (SPAS) Final EIR would occur at the northern border of the project site (see page 4.2-45 of the Draft EIR). The aforementioned non-cancer HI of 3.0 is primarily a result of elevated acrolein emissions from aircraft activity within the SPAS project site. Therefore, it is likely that the acute non-cancer HI impacts from the LAX SPAS project combined with the proposed uses for the LAX Northside Plan would exceed 1.0 within the project site (i.e., within the Northside Plan Area). As a result, the Lead Agency should identify areas within the project boundary that would cumulatively exceed an acute non-cancer HI of 1.0 in the Final EIR. Also, health risk impacts to the proposed project site should also be updated with other data (e.g., TAC emitting facilities identified in Figure 9 of Appendix C of the Final EIR for the proposed project). No. 8

Air Dispersion Modeling

6. Page 15 of Appendix C of the Draft EIR states that NO2 impacts were estimated using the ambient ratio method with a NO2 to NOx conversion ratio of 0.08 for the 1-hr NO2 impacts and 0.75 for the annual NO2 impact. The AERMOD input files included on the USB drive provided to SCAQMD staff list the pollutant modeled as OTHER. As a result, it appears that NO2 emissions were estimated in post processing by multiplying NO to NO2 ambient concentrations using maximum 1-hour or annual concentrations generated by AERMOD. Therefore, the Final EIR should include detailed information on how concentrations were developed. The analysis in the Draft EIR was prepared using AERMOD v12060 dated 08/18/12, which included build-in NO to NO2 conversion routines. If NO2 concentrations were estimated using post-processed NO to NO2 conversion, the Final EIR should demonstrate that the method used was either consistent with EPA approved methodologies or generates NO2 concentrations that are as conservative as EPA methodologies. No. 9

   Further, unitary emissions rates were modeled with AERMOD and pollutant concentrations were estimated by post processing (i.e., multiplying the resultant concentrations by the actual emission rates) using Access. No documentation on the origins of information in tables or on the queries used to complete the post processing was included. Verification of concentrations generated without documentation is very difficult and time consuming. The Final EIR and all future projects with analysis prepared with Access should include detailed documentation that identifies the source of data in tables (spreadsheets, output files, etc.), the units of variables (e.g., (ug/m3)/(1 g/s), lb/day, etc.) manipulation of data using queries, etc.

Operational Mitigation Measures

7. The Lead Agency determined that the proposed project will exceed the CEQA regional operational significance thresholds for NOx and VOC emissions; therefore, SCAQMD staff recommends that the Lead Agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4. No. 10

   Transportation

   a) Provide actual electric vehicle charging stations (not just wiring infrastructure).

b) Provide incentives to encourage public transportation.
c) Create local "light vehicle" networks, such as neighborhood electric vehicle systems.
d) Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this isn't feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.

Energy Efficiency

e) Maximize the use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility (not just wiring infrastructure).
f) Require all lighting fixtures, including signage, to be state-of-the art and energy efficient, and require that new traffic signals have light-emitting diode (LED) bulbs and require that light fixtures be energy efficient compact fluorescent and/or LED light bulbs. Where feasible use solar powered lighting.
g) Maximize the planting of trees in landscaping and parking lots.
h) Use light colored paving and roofing materials.
i) Use passive heating, natural cooling, solar hot water systems, and reduced pavement.
j) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
k) Install light colored "cool" roofs and cool pavements.
l) Limit the use of outdoor lighting to only that needed for safety and security purposes.

No. 10

Other

m) Require use of electric lawn mowers and leaf blowers.
n) Require use of electric or alternatively fueled sweepers with HEPA filters.
o) Require use of water-based or low VOC cleaning products.

Construction Mitigation Measures

8. The Lead Agency determined that the proposed project will exceed the CEQA construction significance threshold regionally for NOx and VOC's; therefore, SCAQMD staff recommends that the Lead Agency provide the following additional mitigation measure pursuant to CEQA Guidelines Section 15126.4.

a) Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks) and if the Lead Agency determines that 2010 model year or newer diesel trucks cannot be obtained the Lead Agency shall use trucks that meet EPA 2007 model year NOx emissions requirements.
b) Construct or build with materials that do not require painting.

No. 11

Further, based on page 4.2-49 of the Draft EIR it appears that the Lead Agency is committed to including Tier 4 engines during construction, however, SCAQMD staff recommends that the Lead Agency provide additional discussion that explicitly identifies this mitigation measure. Specifically, the SCAQMD staff recommends that the Lead Agency include the following:

c) During project construction, all internal combustion engines/construction, equipment operating on the project site shall meet EPA-Certified Tier 3 emissions standards, or higher according to the following:

- ✓ Project start, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- ✓ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

No. 11

Encourage construction contractors to apply for SCAQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for SCAQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: http://www.aqmd.gov/tao/Implementation/SOONProgram.htm

FORM GEN. 160 (Rev. 6-80)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

LETTER NO: LAXN-AL-01

File: SG.CE.

DATE RECEIVED: JUN 17 2014 LOS ANGELES WORLD

DATE: June 11, 2014

TO: Lisa Trifiletti, Director of Environmental & Land Use Planning
Los Angeles World Airports

FROM: Ali Poosti, Division Manager
Wastewater Engineering Services Division
Bureau of Sanitation

SUBJECT: **LOS ANGELES INTERNATIONAL AIRPORT (LAX) NORTHSIDE PLAN UPDATE – NOTICE OF COMPLETION AND AVAIALBILITY OF EIR**

This is in response to your June 4, 2014 letter requesting a review of your proposed project to update regulations for development at the Project site. The Bureau of Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project. No. 1

WASTEWATER REQUIREMENT

The Bureau of Sanitation, Wastewater Engineering Services Division (WESD) has reviewed the request and found the project to be related to setting new regulations for future development occurring within the Northside area of the LAX Specific Plan only. Based on the project description, we have determined that the project lacks sufficient detail for us to offer sewer analysis at this time. As the nature of your project becomes clear, please continue to send us information so that we may determine if a sewer assessment is required in the future. No. 2

If you have any questions, please call Kwasi Berko of my staff at (323) 342-1562.

STORMWATER REQUIREMENTS

The Bureau of Sanitation, Watershed Protection Division (WPD) is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project.

POST-CONSTRUCTION MITIGATION REQUIREMENTS

The project requires implementation of stormwater mitigation measures. These requirements are based on the Standard Urban Stormwater Mitigation Plan (SUSMP) and the recently adopted Low Impact Development (LID) requirements. The projects that are subject to SUSMP/LID are required to incorporate measures to mitigate the impact of stormwater runoff. The requirements are outlined in the guidance manual titled "*Development Best Management Practices Handbook – Part B: Planning Activities*". Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: www.lastormwater.org. It is advised that input regarding SUSMP requirements be received in the early phases of the project from WPD's plan-checking staff. No. 3

LETTER NO: LAXN-AL-01

GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-away to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the SUSMP/LID requirements.

No. 3

CONSTRUCTION REQUIREMENTS

The project is required to implement stormwater control measures during its construction phase. All projects are subject to a set of minimum control measures to lessen the impact of stormwater pollution. In addition for projects that involve construction during the rainy season that is between October 1 and April 15, a Wet Weather Erosion Control Plan is required to be prepared. Also projects that disturb more than one-acre of land are subject to the California General Construction Stormwater Permit. As part of this requirement a Notice of Intent (NOI) needs to be filed with the State of California and a Storm Water Pollution Prevention Plan (SWPPP) needs to be prepared. The SWPPP must be maintained on-site during the duration of construction.

If there are questions regarding the stormwater requirements, please call Kosta Kaporis at (213) 485-0586, or WPD's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 3rd Fl, Station 18

SOLID RESOURCE REQUIREMENTS

The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact Daniel Hackney of the Special Project Division at (213)485-3684.

No. 4

cc: Kosta Kaporis, BOS
Daniel Hackney, BOS
Rowena Lau, BOS

LETTER NO: LAXN-AL-02

WESTCHESTER Town Center

June 11, 2014

Lisa Trifiletti
One World Way
Suite 2188
Los Angeles, CA 90009

RE: Northside Landuse Plan Update Community Meeting

This letter is written to transmit the Westchester Town Center Business Improvement District Board of Director's formal endorsement of the proposed Northside Landuse Plan Update as circulated.

The Board represents every commercial property owner within the Westchester Town Center area. It has received numerous presentations from LAWA staff and others as this Plan has evolved and many of its members have participated directly in its multi-year preparation. The extensive out-reach and stakeholder involvement conducted in conjunction with the Plan's preparation has been remarkable and inspired the faith of the Board members in the Plan and LAWA's staff that prepared it.

No. 1

The Board of Director's of the WTC BID strongly supports the proposed Northside Landuse Plan Update and encourages its implementation without delay so that the local community can realize its benefits.

As we may assist further in any way, please contact me.

Sincerely,

Donald R. Duckworth

C: Westchester Town Center BID Board of Directors

8929 S. Sepulveda Blvd., #130
Westchester, CA 90045
310.417-9030 ph • 310.417-9031 fx
www.WestchesterBID.org

LETTER NO: LAXN-AL-03

WESTCHESTER

June 19, 2014

Lisa Trifiletti
Los Angeles World Airways
One World Way
Suite 2188
Los Angeles, CA 90009

RE: Northside Landuse Plan Update EIR

This letter is written to transmit the Westchester Town Center Business Improvement District Board of Director's formal endorsement of the proposed Northside Landuse Plan Update as circulated.

The Board represents every commercial property owner within the Westchester Town Center area. It has received numerous presentations from LAWA staff and others as this Plan has evolved and many of its members have participated directly in its multi-year preparation. The extensive out-reach and stakeholder involvement conducted in conjunction with the Plan's preparation has been remarkable and inspired the faith of the Board members in the Plan and LAWA's staff that prepared it.

No. 1

The Board of Director's of the WTC BID strongly supports the proposed Northside Landuse Plan Update and encourages its implementation without delay so that the local community can realize its benefits. The Board believes that build-out of the proposed Plan will benefit the existing business community and attract more business to the area.

As we may assist further in any way, please contact me.

Sincerely,

Donald R. Duckworth
Executive Director

C: Westchester Town Center BID Board of Directors
Westchester Playa Neighborhood Council
City Council Office CD11

8929 S. Sepulveda Blvd., #130
Westchester, CA 90045
310.417-9030 ph • 310.417-9031 fx
www.WestchesterBID.org

LETTER NO: LAXN-AL-04

LAX COASTAL
Chamber of Commerce

9100 S. Sepulveda Blvd., Ste. 210
Los Angeles, CA 90045
Phone 310.645.5151 FAX 310.645.0130
www.laxcoastal.com

July 17, 2014

Los Angeles World Airports
Capital Programming and Planning Environmental & Land Use Planning
One World Way, Suite 218
Los Angeles, CA 90045
ATTN: Lisa Trifiletti, Director

Re: Comments to May 15, 2014 Draft Environmental Impact Report
STATE CLEARINGHOUSE NUMBER 2012041003

Dear Ms. Trifiletti:

The LAX Coastal Chamber of Commerce is an organization dedicated to the promotion of business opportunity in our service area which includes Westchester, Playa del Rey, and Marina del Rey and surrounding communities. The Chamber has extensively reviewed the Draft Environmental Impact Report ("DEIR") for the LAX Northside Plan Update and conducted meetings to generate further input and discussion. At its meeting on July 17, 2014, the Board of Directors voted to support the proposed Update to the LAX Northside Plan as more particularly discussed herein below and to submit this letter to the public record as the Chamber's comments to the DEIR. No. 1

The Chamber specifically wishes to acknowledge and commend LAWA and in particular Lisa Trifiletti for their willingness to work with the Chamber to maintain a dialogue regarding the future of this land adjacent to the communities we represent and their willingness to discuss potential ways to accommodate the concerns raised by the Chamber in meetings with LAWA officials. The access to the design team, planners and engineers provided to the Chamber was instrumental in assisting us to develop a thorough understanding of updated plan for the Northside project. We also thank LAWA for extending the deadline for the submission of these comments. No. 2

At the outset it is critical to note that the updated plan dramaticly reduces the scale of the already entitled development project thereby reducing the potential for adverse impacts on the surrounding community. The revised project will provide land for mixed use development and additional green space for the community's benefit. There will be significant local employment opportunities associated with the proposed mixed-use development and this is also a positive. No. 3

These written comments to the DEIR[1] are focused on the impacts of the proposals on the surrounding business and residential communities served by the Chamber[2]. As a result, our focus in submitting these No. 4

[1] For ease of reading, throughout these comments, references are made to specific pages and figures in the two documents submitted by Los Angeles World Airports ("LAWA") and comprising the Draft EIR. The "Main Document" is Volume I of II and Volume II of II is comprised of the Appendices. References made to the Main Document and its Appendices collectively will refer simply to the "EIR". Page numbers (e.g. Vol I, p.271) refer to the page numbering in

comments is on those portions of the EIR which have an impact upon these issues. Our focus has not been on impact on air quality, hydrology and water quality, cultural resources, biotic communities, endangered and threatened species, wetlands, floodplains, coastal zone management, light emissions, solid waste, hazardous materials or any number of other areas required to be included in the EIR. No. 4

In the comments contained herein, we draw the conclusion that we should support the preferred alternative subject to the further consideration of this issue raised.

COMMENTS

Update Dramatically Downsizes Scale of Development

As noted in the analysis of the existing fully-entitled plan compared to the proposed updated plan[3], this proposal reduces the commercial development of the site from 4,500,000 square feet to 2,320,000 square feet. This is not a choice between open space and development. It is, in fact, a massive rethink of the much larger scale development that is already entitled. It will reduce building heights, create larger setbacks and provide greater buffer between the project site and existing residences to the north. The low impact, tech-oriented, creative campus settings envisioned in the "Northside Campus" is consistent with the creative economy that is relocating and developing in the area. No. 5

To be most successful, we strongly believe that the Northside must connect with the existing Westchester Business District oriented along Sepulveda Boulevard from Manchester Boulevard at the north to Lincoln Boulevard at the south. The synergy coming from walking distance development is crucial to the success of both the Northside and the Westchester Business District. As such, we agree with the overall design philosophy of placing the highest density uses the farthest east (Areas 11 and 12A) and tapering off to open space/recreational areas at the far western end of the project. No. 6

Consistent with this also is the critical nature of the proposal to providing space into which local higher education can expand and further serve the burgeoning creative economy. No. 7

We do note that we have received input that there is further opportunity to refine these concepts to include requirements for mature foliage in the buffer zones (Area 2B in particular) and potentially to create a running or bicycling path in these areas and would encourage this a part of final designs consistent with the proposed "pedestrian access paseo." No. 8

"Northside Center" Land Use Restrictions on "Big Box" and "Chain Store" Retail

The DEIR proposes to limit the square footage of retail developments in the areas to the east of Lincoln Blvd generally referred to in the DEIR as the "Northside Center" to a maximum of 100,000 square feet. We understand this to be a noble attempt to prevent the intrusion of so-called "Big Box" retail stores and while No. 9

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the relevant electronic documents of the Main Document and Appendices as distributed in Adobe Acrobat for ease of reference by the reader to those pdf files which are available on the LAWA website.

[2] These comments are submitted pursuant to the California Environmental Quality Act ("CEQA"). As an interested party as defined by CEQA §15086(a)(4), the geographic area defining the Chamber's membership is proximate to LAX and is an area which the DEIR admits will be significantly impacted by the proposals.

[3] Vol. I, p. 1194.

we applaud the concept, we do not believe it goes far enough. Recent developments in this commercial space have included the development of variants for inner city or urban locations in the approximate 60,000 square foot size. We believe that "Northside Center" retail establishments should be limited to nothing in excess of 50,000 square feet. No. 9

Furthermore, we believe that there should be an additional limitation on retailers in the "Northside Center" such that so-called "chain stores" comprise no more than 50% of the overall development. This would be more in character with the local business community and be consistent with the avowed purpose of creating a project which meets the criteria of an overall benefit to the community while also meeting FAA requirements for uses providing fair value to the airport. No. 10

Areas 1 and 2A: Stormwater Treatment Facility and Open Space

Critical to the overall plan is that, in providing dense development at the eastern end of the project, there be some protected areas at the far west end in Areas 1 and 2A. We are concerned that plans for the envisioned stormwater treatment facility to be funded by Prop O funds from the City of Los Angeles may be in jeopardy due largely to inaction by the City of Los Angeles, to address FAA revenue diversion issues. We believe these facilities must be located here in order to preserve the open space and recreational possibilities for these parcels as a part of the treatment facility. In any event, Areas 1 and 2A should not, under any circumstances, be made available for uses inconsistent with the community in those areas and should remain open for future use as envisioned by the DEIR. There should be no decision to "spread" the commercial uses of adjacent areas onto these two parcels under any circumstances. LAWA and LABOS are both departments of the same City, of which we are a part, and need to find a way to work together to make this facility and these community-serving uses a reality. No. 11

Traffic

As an overarching rule that should be applied to traffic as it relates to the proposed updated plan, through design features, traffic should be funneled to and from the Northside as directly as possible to the adjacent 105 and 405 freeways. More specifically it should be diverted from and not through adjoining residential areas. Chief among these concerns being prevention of expansion of the capacity of the Pershing/Nicholson north/south corridor. This would appear to be consistent with PDF LU-20 and 21[4]; however, the traffic study shows significant traffic coming through these areas causing confusion and concern on our part. We would also like to have seen an appropriate "Neighborhood Protection Plan" as a component of the DEIR including but not limited to traffic calming measures that can help address these concerns. No. 12

The traffic study's analysis[5] of project traffic impacts to intersection and freeway operations are generally consistent with relevant guidelines. However, opportunities exist for enhanced mitigation of intersection impacts, enhanced planning related to bicycle access and proposed high-capacity transit facilities and bicycle access.
It is apparent that some of the intersections will be adversely impacted by the Project (increased intersections with LOS E/F) and will not be improved in the "With Project With Mitigation" scenario. No. 13

[4] Vol I, 4.9-40, p. 683
[5] Vol II, Appendix "E", pp. 1626-3106.

	# of Intersections Operating at LOS D* or Better; Operating at LOS E** or F*** (average of AM, PM)		
	No Project	With Project	With Project with Mitigation
Existing (2012)	100; 8	94; 14	94; 14
Future (2022)	86; 22	84; 24	84; 24

*Level of Service (LOS). LOS D or better (i.e. A to C) is generally acceptable with LOS D approaching unstable traffic flow at the intersection during peak hours.
**LOS E indicates intersections operating at capacity (unstable flow).
***LOS F indicates forced or breakdown flow (the intersection is effectively over-capacity).

No. 13

There may be opportunity to improve the operating efficiency of some of the intersections as part of the Project to improve this scenario. This represents an opportunity for further study.

The study also reports that by the year 2022, transit ridership will exceed available transit capacity during some peak hours runs (the exact methodology supporting this conclusion is not identified). To mitigate these potential future impacts to the regional transit system, the proposed Project proposes to purchase two additional transit buses for Route 115, supplementing bus service along Manchester Blvd during peak hours. Further, space on the Project site is proposed to be potentially developed as a future transit station.

The study identifies multiple major transit projects that are expected to be completed before the full development of the proposed Project (2022):

No. 14

- Crenshaw/LAX Transit Corridor, to be completed in 2019
- Airport Metro Connector, to be completed in 2020
- South Bay Metro Green Line Extension, potentially to be completed in 2020

The new transit capacity to be provided by these new projects is not explicitly included in the above peak hour transit capacity calculations; these projects such as light rail projects, will provide substantial new transit capacity within the vicinity of the Project site. Given the close proximity of the proposed Project site to these transit projects, further consideration should be given to this how site could be serviced and integrated into these transit networks.

Bicycle Access

The study also notes existing and proposed bicycle facilities. The most recent City of Los Angeles bicycle plan, the 2010 Bicycle Plan, is cited. Pershing Dr. and Westchester Parkway already feature bicycle lanes and numerous streets within the study area are also proposed for future bicycle lanes and routes.

No. 15

Opportunities may exist for additional enhanced bicycle facilities, both for on-street facilities and for bicycle storage. Such options would be especially desirable with the completion of anticipated nearby rail transit projects and a potential on-site transit center. These options should be studied further to better understand how such on-site networks could link to external networks.

Airport Support Areas/Vehicular Access

A significant portion of the project, comprising some 900,000 square feet, are the areas to the south of the Westchester Parkway and inside the security perimeter of the LAX airfield itself. Much of the proposed use of these areas is for future construction material staging and the relocation of facilities currently located on World Way which are being displaced by development there such as the Midfield Satellite Concourse. While we have no objection to the use of these areas for this purpose, the DEIR fails to address the vehicular access to these areas. To the extent that these Airport Support areas are presumably accessed only by those persons either directly employed by LAWA itself or its contractors, this presents a unique opportunity to fulfill the conceptual overview of funneling traffic to the adjacent 105/405 Freeways. As a means of mitigating impact on surrounding communities and intersections to the north, all LAWA employees and contractors working in such areas should be required to access these areas from on airport access at World Way and Pershing by means of ingress and egress from the south of this intersection only or off Sepulveda adjacent to the entrance to LAX. There should be no direct access to these areas from the

No. 16

Westchester Parkway nor should any LAWA employees or contractors access these areas via Pershing to the north of Westchester Parkway. No. 16

Airport Police Facilities

Area 12 A East, currently in use for Fire Station 5, should also be studied as a potential location for the consolidation of Airport Police facilities currently scattered in multiple locations. We note that Airport Police currently have jurisdiction extending to Manchester Blvd. on the north and this location would provide quick access through the locked gate at the Fire Station. We are mindful that it may not be possible to relocate all Airport Police facilities here especially given the obvious need for quick response on the airfield and to Central Terminal Area buildings, but a substantial portion of administrative and other facilities could be potentially located here. No. 17

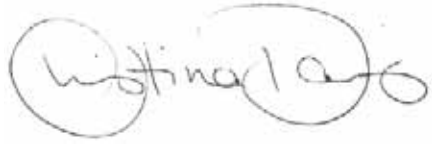
Conclusion

As noted by the NOP, "The Proposed Project" is intended to create a vibrant, sustainable center of employment, retail, restaurant, office, hotel, research and development, education, civic, airport support, recreation, and buffer uses that support the needs of surrounding communities and LAWA." We concur with this conclusion and continue to be encourage by LAWA's work with the business community on the future development of the Northside. This project will bring additional commercial and retail development and along with it more local jobs and new open space amenities for our community. No. 18

As required by law, LAWA must respond to these comments in writing providing the necessary information, analysis, and as applicable, additional technical reports[6]. Said written responses to the comments contained herein[7] shall be directed to:

LAX Coastal Area Chamber of Commerce
9100 S Sepulveda Blvd., Ste. 210
Los Angeles, CA 90045

Respectfully submitted:



Christina V. Davis
President /CEO

Cc: Supervisor Don Knabe

[6] CEQA, Public Resources Code Section 21000, et. seq.
[7] CEQA, Public Resources Code Section 21092.5.

Bicycle Advisory Committee of the City of Los Angeles

VIA E-MAIL: laxnorthside@lawa.org

Lisa Trifiletti
Director, Environmental and Land Use Planning
City of Los Angeles
Los Angeles World Airports
1 World Way, Room 218
Los Angeles CA 90045

Re: LAX Northside Plan Update Draft Environmental Impact Report

Dear Ms. Trifiletti:

As Chair of the City of Los Angeles Bicycle Advisory Committee ("BAC"), I respectfully submit the following comments regarding the Draft Environmental Impact Report ("DEIR") for the LAX Northside Plan Update ("Project").

The BAC was established in 1973 "to act in an advisory capacity to . . . the various agencies of the . . . City of Los Angeles in the encouragement and facilitation of the use of the bicycle as a regular means of transportation and recreation." Since adoption of the 2010 Bicycle Plan by a unanimous vote of the Los Angeles City Council, the BAC has also been charged with monitoring the "progress of Bicycle Plan implementation." Policy 3.2.1. We take seriously our obligation to ensure that the 2010 Bike Plan and other policies and plans supporting bicyclists are fully implemented. No. 1

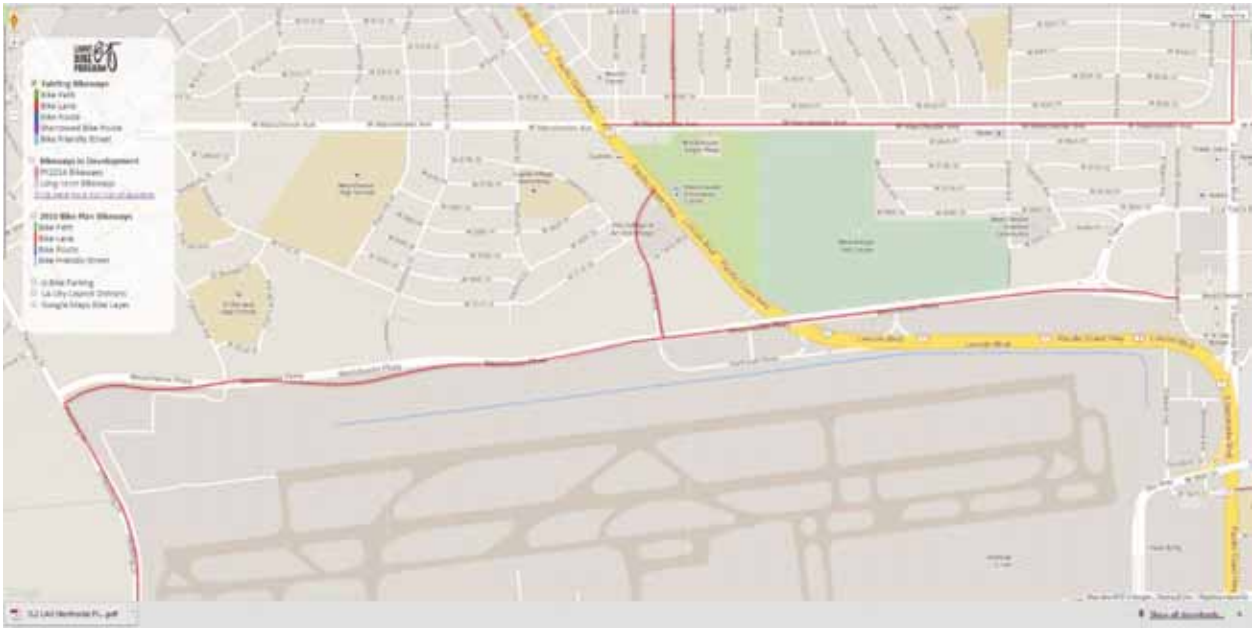
<u>The DEIR Must Analyze Potential Impacts to Applicable Bike Plans and Bicyclists</u>

The purpose of the DEIR is to "inform LAWA, the City of Los Angeles, and the public about the significant environmental effects of the proposed Project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the proposed Project." (DEIR, p. ES-1.) The Initial Study for the Project concluded that it could have a potentially significant impact on "adopted policies, plans or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance of those facilities." Thus, the DEIR must fully and carefully evaluate whether such conflicts actually exist and, if so, consider methods for mitigating those impacts. No. 2

The DEIR Fails to Identify, and Thus Fails to Analyze Potential Impacts on, Most Existing and Proposed Bikeways in the Vicinity of the Project

To determine whether the Project conflicts with the 2010 Bike Plan regarding bicycle facilities, the DEIR must first correctly identify the existing and proposed bikeways[1] in applicable plans.[2] Because the DEIR does not do so, its analysis is by definition inadequate. Quite simply, the DEIR cannot evaluate impacts on bikeway projects that it does not acknowledge even exist.

The DEIR ignores most of the existing or potential on-street bikeways in the immediate vicinity of the project. According to the DEIR, "there are currently dedicated bicycle lane on Westchester Parkway and Pershing Drive adjacent to the Project Site." The map below, from the LADOT Bicycle Program website, http://www.bicyclela.org, shows that there are also existing bike lanes on Manchester Avenue and Loyola Drive adjacent to the Project Site.



No. 3

The DEIR also states that "bicycle routes are proposed by the 2010 Bicycle Plan on Loyola Boulevard and Emerson Avenue adjacent to the Project Site." This description omits most of the 2010 Bike Plan's proposed bikeways in the vicinity of the project. The map below shows "Bikeways in Development" and "2010 Bike Plan Bikeways" (http://www.bicyclela.org/fullscreenmap.html). LADOT is **currently developing** bikeways on La Tijera Blvd through and to the east of the project, and bikeways on Manchester Avenue east of Sepulveda (just outside the Project Area). In the future, bike lanes are proposed on Pershing Drive north of Manchester, on Lincoln Blvd (PCH), and Sepulveda Boulevard.

[1] For purposes of this letter, "bikeways" is a collective term for off-street bike paths, on-street bike lanes, and signed bike routes.
[2] For purposes of this letter, "bikeways" is a collective term for off-street bike paths, on-street bike lanes, and signed bike routes.

None of these proposed bike lane projects are mentioned, and the DEIR thus fails to consider whether the Project will have impacts on these bike facilities. That renders the DEIR legally inadequate.

Moreover, the 2010 Bike Plan proposes that Loyola Boulevard and Emerson Avenue be developed as Bicycle-Friendly Streets, not bike routes. A standard bike route consists of nothing more than signage, and does not reconfigure the roadway at all. Under the 2010 Bike Plan, a Bicycle-Friendly Street must "include at least two traffic-calming engineering treatments in addition to signage and shared lane markings" (2010 Bike Plan, p. 3-49). As part of the Neighborhood Network, these streets are intended to provide a comfortable riding experience for bicyclists of all experience levels, including children, women, families, young adults and seniors (in bike planning, these are sometimes referred to as streets for "8 to 80" year old bicyclists). No. 3

This distinction is critically important for analyzing the potential impacts of the Project. If analyzed as a "bike route," the question is whether the Project will prevent the City from installing "Bike Route" signs. In nearly every case, the answer would clearly be "no." If analyzed as a Bicycle-Friendly Street, the question is whether the Project might increase traffic volumes or vehicle speeds such that the street becomes less comfortable for an 8-year-old or 80-year-old bicyclist. Those are far different questions; the DEIR does not begin to address the latter, and thus is deficient.

The DEIR Ignores The Project's Significant Impacts On Bicyclists

Construction Impacts

The DEIR fails to analyze the impacts that Project construction would have on bicyclists. For example, the DEIR states that the Project's primary haul routes are three streets with existing or under-development bike lanes: Manchester, Pershing and La Tijera (p. 4.14-44). Because the DEIR does not acknowledge the bike lanes on Manchester or La Tijera, or proposed lanes on Pershing north of Westchester Parkway, the DEIR cannot possibly have evaluated those impacts. Moreover, the DEIR states that construction likely will result in sidewalk and lane closures on Manchester and Lincoln Blvd, No. 4

streets with existing or proposed bike lanes that the DEIR ignores. The street closures, in particular, will have a significant, adverse impact on bicyclists.

In Los Angeles, lane closures on streets with bike lanes typically involved closing the bike lanes themselves, and forcing bicyclists to ride in mixed-flow lanes with motor vehicles. On high-speed streets such as Manchester and Lincoln, that puts bicyclists in danger. Such closures often result in localized congestion, in which enraged motorists engage in aggressive, hostile driving. The DEIR says that unspecified "provisions would also be made to incorporate safety precautions for pedestrians and bicyclists . . . to the extent feasible." Through its lack of specificity, the DIER fails to provide bicyclists any assurance that the impacts on bicyclists will be mitigated.

A genuine mitigation measure would be specific. At a minimum, the DEIR must commit LAWA to the following during construction: No. 4

1. No bicycle lane will be closed, and no "shareable" lane will be narrowed, without full compliance with all state, federal and local regulations regarding closure of a bike lane, including all required temporary lane closure markings.
2. Whenever a bicycle lane is closed, it will be inspected multiple times per day to ensure that the lane closure is properly marked and signed.
3. To ensure that the bike lanes are closed properly, any permit for a lane closure should impose a penalty to be deposited into the City's Bicycle Plan Trust Fund.
4. When and where a bike lane is temporarily closed, a law enforcement officer will be stationed at the location to ensure that motorists comply with all applicable provisions of the California Vehicle Code, including section 21760 (the Three Feet for Safety Act) and 21703 (safe following distance).[3]

Project Impacts

The Project is expected to generate nearly new 24,000 daily vehicle trips, with nearly all of those vehicles expected on streets designated for future bike lanes in the 2010 Bike Plan. (DEIR, pp. 4-14.48 & -49.) The City of Los Angeles has an abysmal record of installing bike lanes on major streets like Manchester, Lincoln and Sepulveda that are perceived by motorists as congested. Thus, adding tens of thousands of trips to streets near the Project will almost certainly have an adverse impact on the 2010 Bike Plan. No. 5

Because The Project Will Create More Than 24,000 Daily Vehicle Trips, It By Definition Has An Adverse Impact On Implementation Of The 2010 Bike Plan

For example, under the 2010 Bike Plan and its accompanying Five-Year Implementation Plan, the City promised to evaluate and install 40 miles of bikeway projects each year. The Bike Plan was adopted more than 3½ years ago. Of the 40 miles included in so-called Year One projects, only 7.1 miles have been installed, less than 18%. No proposed Year One bike lane project has been installed anywhere near No. 6

[3] The California Department of Motor Vehicles indicates that for motorists following cyclists, a safe following distance is 4 seconds. *See* https://www.youtube.com/watch?v=zu0gzKImJqY at 3:15-4:00. This is particularly important in and near a construction zone, where there is a greater likelihood of debris in the roadway, uneven pavement, etc.

the Westside. The City has just begun its analysis of "Year Two" projects, and Westside elected officials have already declared that they oppose bike lane projects on Westside streets such as Westwood Blvd (connecting directly to UCLA) and 6th Street (connecting to LACMA, the La Brea Tar Pits, and future subway stations at Wilshire/La Brea and Wilshire/Fairfax.

In short, any City project that adds traffic to streets proposed for bike lanes must be considered to have a significant adverse impact on bicyclists, because the Project makes it significantly less likely that the bike lanes will be installed. It bears noting that this is an impact, and a problem, that is entirely of the City's own making. If the City had any sort of positive record of installing bicycle infrastructure along key corridors, despite modest increases in traffic delay for motor vehicles, LAWA might be able to argue that the increases in traffic volumes and traffic congestion that this project will create would not have an impact on the 2010 Bike Plan. But because the City has used "traffic congestion" as a mantra for failing to install bike lanes on nearly every street where they are proposed, the City and LAWA cannot deny that increased traffic volumes will have a significant, adverse impact on bicyclists. No. 6

The Project Will Have Significant Traffic Impacts On Streets With Existing Or Proposed Bikeways

The DEIR analyzes traffic impacts under the "LOS" standard that focuses solely on automobile traffic, and ignores bicyclists and pedestrians. Under this auto-centric standard, the Project will cause "significant traffic delay impacts at several intersections" (DEIR p. 4.14-80), including:

1. Lincoln Blvd and Venice Blvd (2010 Bike Plan includes bike lanes on Lincoln; existing bike lanes on Venice Blvd)
2. Lincoln Blvd and Mindanao (Lincoln is proposed bike route in Los Angeles County Bike Plan)
3. Lincoln Blvd and Fiji (Lincoln and Fiji are proposed bike routes in Los Angeles County Bike Plan)
4. Lincoln Blvd and Jefferson Blvd. (2010 Bike Plan includes bike lanes on Lincoln; bike lanes on Jefferson are currently in development per LADOT[4])
5. Lincoln Blvd and Manchester Ave (2010 Bike Plan includes bike lanes on both streets)
6. Sepulveda Blvd and Manchester Ave (2010 Bike Plan includes bike lanes on both streets)
7. Sepulveda and La Tijera (2010 Bike Plan includes bike lanes on both streets)
8. Sepulveda and Westchester Parkway (2010 Bike Plan includes bike lanes on both streets)
9. Sepulveda and i-105 westbound ramps (2010 Bike Plan includes bike lanes on Sepulveda)
10. Sepulveda and Imperial Highway (existing lanes on Imperial; 2010 Bike Plan includes bike lanes on Sepulveda)
11. Airport and Manchester (2010 Bike Plan includes bike lanes on Manchester)
12. Aviation/Florence and Manchester (just outside City of LA, in City of Inglewood, which has no bike plan, but LA 2010 Bike Plan has bike lanes on Manchester).
13. La Cienega and Florence (in City of Inglewood, which has no bike plan)
14. La Cienega and Manchester (in City of Inglewood, which has no bike plan)
15. Aviation and Arbor Vitae (2010 Bike Plan includes bike lanes on both streets)
16. La Cienega and Arbor Vitae (2010 Bike Plan includes bike lanes on Arbor Vitae)
17. La Cienega and Slauson (unincorporated Los Angeles County)

No. 7

[4] https://docs.google.com/spreadsheet/ccc?key=0Am0exx-bY8EVdGprYnlQa2FOdTZPc1c5N1h6b2ZwZFE&usp=sharing#gid=0.

In short, at every intersection in the City of Los Angeles where the DEIR projects significant traffic impacts, at least one intersecting street (and often both) is designated for bike lanes in the 2010 Bike Plan. It is beyond question that projected traffic impacts make it significantly more difficult to obtain political approval to install bike lanes on these streets. That is a significant, adverse impact on bicyclists that is not mentioned, much less analyzed or discussed, in the DEIR. No. 7

The DEIR's proposed mitigation measures for motor vehicle traffic impacts would, in turn, have a significant adverse impact on bicyclists, both in their existing configuration and as proposed in the 2010 Bike Plan.

By Increasing Traffic, The Project Will Make Streets Less Safe For Bicyclists, In Violation of the 2010 Bike Plan's Goal to Make Every Street a Safe Place to Ride a Bicycle

The State of California and the City of Los Angeles have statutes, ordinances and policies declaring that bicyclists may ride on every street, including streets in the vicinity of the Project. Streets and Highways Code sec. 885.2 finds and declares that "the design and maintenance of many of our bridges and highways present physical obstacles to use by bicycles" and "the bicycle is a legitimate transportation mode on public roads and highways." California Vehicle Code section 21200 provides that "a person riding a bicycle . . . upon a highway has all the rights and is subject to all the provisions applicable to the driver of a vehicle, except those provisions which by their very nature can have no application." These state laws are embodied in the 2010 Bike Plan, which establishes the following goal: "Make **every street** a safe place to ride a bicycle." Thus, the issue for the DEIR to consider is not only whether the project has an impact on formally-designated bike infrastructure, but also whether any aspect of the Project, including proposed motor vehicle traffic mitigation measures, makes any area street a less safe place for bicyclists. If it does, the Project decreases the performance of the street for bicyclists. No. 8

Most Los Angeles streets do not have lanes that are wide enough to be safely shared by motorist and bicyclists. Bicyclist, thus, must "take the lane" and ride in mixed-flow traffic. When traffic volumes are low to moderate, motor vehicles can easily move into an adjacent lane to pass a bicyclist. There are often lengthy gaps between bunches of cars where no conflicts exist. As traffic volumes increase, the potential for cars to be "stuck" behind a bicyclist increases. That means increased aggressive and hostile driving near bicyclists, which makes the streets less safe for bicyclists and reduces the performance of the street for us.

On those streets with relatively wide curb lanes, bicyclists can (and usually do) attempt to share the travel lane with motorists, even if that requires bicyclists to ride in the "door zone" and/or weave in and out of parking lanes. Thus, any proposed modification to a street that makes it less "shareable" between bicyclists and motorists has an adverse impact on bicyclists.

The DEIR simply conducts the standard LOS analysis, but makes no effort to either quantitatively or qualitatively evaluate the impact on bicyclists of increased vehicle trips. In short, even if the LOS analysis shows no significant impact on motor vehicles, that does not mean that the Project will not have a significant impact on bicyclists, because the levels of congestion that make a street less comfortable and less safe for a bicyclist are lower. Moreover, the undisputed evidence regarding the City's failure to install on-street bikeways—not only since adoption of the 2010 Bike Plan but in the 37 years since

adoption of the City's first bike plan in 1977—demonstrates that any increase in traffic volumes is highly likely to impact the City's willingness to install on-street bike infrastructure. No. 8

Many Proposed Traffic Mitigation Measures Will Adversely Impact Bicyclists

Many of the traffic mitigation measures included in the DEIR will have an adverse impact on bicyclists.

1. At Sepulveda and Manchester, the proposed right turn lane would impact current bicyclists' ability to ride in the shoulder. Because it is unlawful for a bicyclist to ride straight through a marked right-turn lane, the proposed right turn lane would force bicyclists to "take" the full right lane while riding westbound. This will subject bicyclists to harassment. Looking to the future, any reconfiguration of roadway width to benefit motorists makes it exceedingly unlikely that the City will later configure the roadway to include bike lanes as called for in the 2010 Bike Plan.
2. At Sepulveda and La Tijera, adding a second left turn lane (and shifting all other westbound lanes northward to the curb) is entirely inconsistent with LADOT's current workplan that includes designing bike lanes for this stretch of La Tijera. Even if this bike lane project does not go forward, the "mitigation" removes a shoulder that can be used by bicyclists and curb parking that provides a buffer from traffic for sidewalk users.
3. At Sepulveda and Imperial Highway, there are existing bike lanes on Imperial Highway, and bicyclists proceeding west on Imperial Highway must ride across the right turn lane to proceed west. Creating a double-right turn lane makes conditions much less safe and much more difficult for bicyclists. From a review of Google Maps, it appears that this double right-turn lane already has been installed. Nevertheless, increasing the volume of right-turning vehicles, as the Project will do, will make this already-dangerous location even worse for bicyclists. The DEIR acknowledges that the bike lane must be shifted, but fails to acknowledge that this change exposes bicyclists to increased risks (p. 4.14-103). No. 9
4. At Airport Blvd and Manchester, the DEIR proposes significant reconfiguration of the lane alignments, without discussing how those changes might impact installation of bike lanes on Manchester. It seems likely that installing double-left turn lanes on the eastbound and westbound approaches will make it significantly more difficult to extend bike lanes through the intersection.

Simply, the DEIR is focused solely on ensuring that the Project does not make things worse for motorists, and ignores the fact that many of the proposed mitigations will make conditions worse for bicyclists.

These significant impacts on bicyclists can be mitigated. To mitigate the impact that increased traffic will have on implementation of bike lanes as called for in the 2010 Bike Plan, LAWA and the City must:

1. Make a binding commitment to installing bike lanes on all streets called for in the 2010 Bike Plan in the vicinity of the Project; fund and conduct all necessary environmental review for those lanes; and install the bike lanes.
2. Make a binding commitment to implement "Bicycle Friendly Street" projects on all streets designated as such in the 2010 Bike Plan, including Loyola Blvd., Emerson Ave., 83rd Street, Wiley Post Ave. and Will Rogers Street. The streets must have significant traffic calming features to ensure that they are comfortable for bicyclists of all ages and abilities. It is worth noting that these measures, called for in the Bike Plan, will address nearby residents' concerns about

increased "cut through" traffic on their streets, because Bicycle Friendly Streets are specifically designed and intended to substantial reduce, if not eliminate, cut-through traffic. No. 9

The Project Fails to Propose Any Meaningful Integration of Bicycles Into Transit Access to The Project; The DEIR Fails to Discuss or Analyze This Issue.

The 2010 Bike Plan includes Transit Objective 1.3: "Expand bicyclists' range and mobility options through the integration of bicycling into the region's transit system (Bike Plan, p. 4-79). Metro has adopted a "First Last Mile Strategic Plan and Planning Guidelines" (http://media.metro.net/docs/sustainability_path_design_guidelines.pdf). Here, the Project is relatively close to the under-construction Crenshaw/LAX light rail line, including stations at Florence/Hindry, Aviation/Century (also a Green Line Station), and an under-consideration additional station near Aviation/96th Street. While most of the Project area is outside the ½ mile walking catchment area surrounding these stations, the Project is within the 3-mile bicycle catchment area. The DEIR claims that it will mitigate traffic impacts through a Transportation Demand Management (TDM) program that would, among other things, "promote bicycling and walking" (DEIR, p. 4.14-92). However, there is no indication that LAWA has given any consideration to improving bicycle access to the Project, particularly from transit stations, as called for by the 2010 Bike Plan and Metro planning documents. No. 10

To comply with these applicable policies and programs, LAWA must include:

1. Analysis, approval, funding and installation of high-quality bikeways between Crenshaw/LAX light rail stations and the Project. This would include proposed bike infrastructure on Manchester, Aviation and Arbor Vitae. High-quality bikeways would include a combination of off-road paths, cycle tracks and/or buffered bike lanes. At a minimum, LAWA and the City must install standard Class II bike lanes along at least one route connecting each light rail station to the Project.
2. Modification of proposed "paseo" along Westchester Parkway to include a paved bicycle path, or joint pedestrian-bike path.

The Project's Numerous New Driveways Adversely Impact Bicyclists

The Project includes several new driveways along Westchester Parkway, which currently has on-street bicycle lanes (DEIR, p. 4.14-43). A significant portion of bicycle collisions occur at driveways and intersections, and a significant percentage of collisions occur because motorists merge or turn into the bicyclists' path, or motorists' failing to yield to bicyclists. *See, e.g.,* http://safety.fhwa.dot.gov/PED_BIKE/univcourse/pdf/swless04.pdf. Thus, by greatly increasing the potential conflict zones between motorists and bicyclist, the Project's design increases the risk of injury to bicyclists using the existing Westchester Parkway bike lanes, and decreases the performance of that facility for bicyclists. No. 11

LAWA and the City must mitigate this significant impact, including by:

1. Redesigning the proposed Paseo to include a paved, off-road bicycle path and/or
2. Installing cycle tracks along Westchester Parkway.

While an unpaved Paseo could not be used by bicyclists riding road bikes or most hybrid bikes, they can be used by bicyclists riding mountain or BMX-type bicycles designed for off-road use. A substantial

percentage of Los Angeles' bicyclists, particularly lower-income workforce cyclists, ride these types of bikes and can be expected to ride on the Paseo in any event. The Paseo should be designed to accommodate all bicyclists.

In addition, any casual observation of motorists exiting driveways in the City of Los Angeles reveals that a very large percentage of right-turning motorist never look to the right before crossing a sidewalk, bike lane or bike path. A significant percentage of motorists fail to slow, much less come to a required stop, before entering crosswalks. The DEIR indicates that some, but not all, of these new driveways and access points, would be "stop controlled," by which is presumably meant a stop sign. As noted, stop signs at driveways are meaningless to a significant number of motorists. To mitigate the impacts on bicyclists and pedestrians from these numerous new driveways, the Project should include engineering treatments—such as speed humps, speed tables, raised sidewalks, etc.—to ensure that motor vehicles enter and drive across pedestrian and/or bike facilities at a speed that is safe for active transportation users. LAWA's sole concern cannot be the efficient movement of cars as rapidly as possible.

No. 11

Because the City Has Not Provided On-Street Bike Infrastructure, All Sidewalks Must Be Designed to Accommodate Bicyclists

According to the LA County Bike Coalition's 2013 Los Angeles Bicyclist and Pedestrian Count (http://la-bike.org/sites/default/files/Websitefiles/LACBC%202013%20LA%20Bike%20Count%20Report.pdf), on streets without bike lanes approximately 50% of all bicyclists ride on the sidewalk. In the City of Los Angeles, bicycling on sidewalks is legal. Unless and until the City installs safe, high-quality on-street bike infrastructure, the City must ensure that sidewalks are designed to accommodate bicyclists. That means ensuring that sidewalks are wide enough to accommodate bicyclists and pedestrians together, and that curb cuts and "beg buttons" are positioned to accommodate bicyclists. The DEIR's proposed mitigation measures for motor vehicles includes reducing sidewalk widths at certain intersections, including Aviation and Arbor Vitae (DEIR, p. 4.14-103). If any aspect of the project affects the functionality of the sidewalks for bicyclists, that creates a significant impact that must be mitigated.

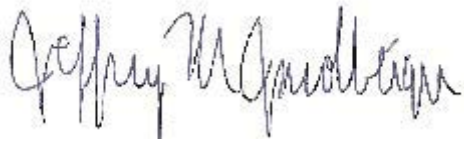
No. 12

* * *

For all of the foregoing reasons, the proposed Project will create significant impacts for bicyclists and conflicts in numerous respects with the 2010 Bike Plan and other plans and policies designed to promote active transportation and make such travel modes safer. The DEIR fails to acknowledge, much less analyze, discuss and propose mitigation measures for bicyclists. If you have any questions or require clarification, please contact me at jeff.jacobberger@gmail.com or 323.646.3308.

No. 13

Very truly yours,



Jeff Jacobberger
Chair, Bicycle Advisory Committee

LETTER NO: LAXN-AL-06

Neighborhood Council of Westchester Playa

8726 South Sepulveda Boulevard, PMB 191A Los Angeles, CA 90045
213.473.7023 ph • 310.301.3564 fx
email: inquiries@ncwpdr.org • www.ncwpdr.org

July 21, 2014

Lisa Trifiletti, Director, Environmental and Land Use Planning
City of Los Angeles
Los Angeles World Airports
1 World Way, Room 218
Los Angeles, CA 90045
Email: laxnorthside@lawa.org

Ms. Trifilletti:

The Neighborhood Council of Westchester/Playa Board of Directors is writing to convey the support of the council and the Westchester/Playa stakeholders for the Los Angeles World Airport ("LAWA") Northside Project, as presented to the Board of Directors by Lisa Trifiletti, Airports and Facilities Planning, and her staff. LAWA, and in particular Ms. Trifiletti and her staff, have engaged in extensive community outreach and have endeavored to incorporate the wishes of the community with respect to the various uses and designs for the project. The Northside Project has been the subject of several of our Planning and Land Use Committee meetings, including an extensive meeting to review the draft Environmental Impact Report ("EIR") based upon that review we would like to make several formal comments upon the EIR: No. 1

(1) That further study of the intersections located at Nicholson and Culver and analysis of the intersection at Culver and Vista del Mar be performed; No. 2

(2) That signage with directions to the freeway and beach on the north corner of Falmouth and Manchester be installed in order to limit people attempting to drive through the neighborhood; No. 3

(3) That the buses purchased for Route 115 travel the long route and not the short route; No. 4

(4) That analysis of Route 3 along Lincoln Boulevard be performed and further study of the intersections to determine if the addition of buses on this route will mitigate traffic issues; No. 5

(5) That Playa Vista be included in the mentions of related projects in the draft EIR. Playa Vista is not mentioned in the related projects of the draft EIR, but should be mentioned; No. 6

(6) That the project descriptions for the LAX Northside Campus District at page 2-13 and the LAX Northside Center District at page 2-14 be corrected, as they are currently reversed. No. 7

(7) That the EIR include a proposed consolidated transportation management organization ("TMO"). The TMO would act as a proactive organization so that building owners, employers, local government representatives and others can work together and collectively establish policies, programs and services to address local transportation problems. A consolidated TMO would allow for coordination of services like shuttle service, vanpools, ridesharing, and use of public transportation services; No. 8

(8) That a below ground storm water treatment plant be constructed in Area 1; No. 9

(9) That Westchester Golf Course be upgraded to a regulation par 72 course; and No. 10

(10) Should the neighborhood north of the project to Manchester, between Sepulveda Westway and McConnell choose to seek permit parking due to parking issues created by the project, the study necessary to obtain the parking permits would be paid for by LAWA. No. 11

Very truly yours,

/s/ Cyndi Hench

President
Neighborhood Council of Westchester Playa

Cc: Los Angeles City Councilman Mike Bonin

BuchalterNemer
A Professional Law Corporation

18400 Von Karman Avenue, Suite 800 Irvine, California 92612-0514
Telephone (949) 760-1121 / Fax (949) 720-0182

Direct Dial Number: (949) 224-6292
Direct Facsimile Number: (949) 224-6480
E-Mail Address: *blichman@buchalter.com*

July 25, 2014

VIA U.S. MAIL AND E-MAIL
(LTRIFILETTI@LAWA.ORG)

Los Angeles World Airports
Capital Programing and Planning
Environmental and Land Use Planning
Attn: Lisa Trifiletti, Director
One World Way, Suite 218
Los Angeles, CA 90045

Re: Comments - Draft Environmental Impact Report for Los Angeles International Airport (LAX) Northside Plan Update

Dear Ms. Trifiletti:

The following constitutes the comments of the City of Culver City ("Culver City") concerning the Draft Environmental Impact Report ("DEIR") for the Northside Plan Update ("Project"). As a threshold matter, please be advised that Culver City appreciates the efforts by Los Angeles World Airports ("LAWA") to open a dialogue with communities surrounding Los Angeles International Airport ("LAX") concerning impacts of the more than two million square feet of new development in the Northside Project on those communities, both independently, and when taken together with plans for development in and around LAX, itself. Nevertheless, Culver City maintains some serious concerns about the scope, depth and conclusions of the DEIR's air quality, traffic and transit analyses, because they omit any assessment of the Project's impacts on Culver City, defining Culver City outside the geographic scope of the Project's environmental effects even though the City is located only two miles from the Project site.

No. 1

I. THE SCOPE OF THE DEIR AIR QUALITY ANALYSIS IS IMPERMISSIBLY NARROW.

It is Culver City's understanding, based on the DEIR, that the estimated operational emissions of volatile organic compounds ("VOCs") and nitrogen oxide ("NO_x") from Project related stationary sources, such as building energy use, landscaping equipment, consumer products and architectural coatings, DEIR § 4.2.3.1.1, p. 4.2-18, and off-site emissions from on-road mobile sources, including motor vehicles bringing employees to work, *Id.*, are greater than the significance thresholds, *see* DEIR, § 4.2.3.4.1, p. 4.2-38, established by the Southern California Air Quality Management District ("SCAQMD") in its 2012 Air Quality Management

No. 2

Plan ("AQMP"), DEIR, § 4.2.2.1.3, p. 4.2-9, for both of which pollutants the South Coast Air Basin was in nonattainment status as of December 28, 2012. DEIR, § 4.2.2.1.1, Table 4.2-2. No. 2

Culver City has three primary issues with the DEIR's analysis.

A. The Application of the Air Quality Standards Established in an Unapproved AQMP Renders the DEIR's Conclusions Questionable.

The DEIR employs the standards established in the SCAQMD's 2012 AQMP, which the DEIR states was approved by SCAQMD's Board of Governors on December 7, 2012. DEIR, § 4.2.2.13, p. 4.2-9. The DEIR does not similarly state that the 2012 AQMP had been approved by the Federal Environmental Protection Agency ("EPA") during the analytic period encompassed by the DEIR. This absence of requisite EPA approval leaves open the question of the Project's compliance with the previously approved, and apparently still applicable, prior AQMP, or any alternative standard applicable in the absence of an approved AQMP. Without such analysis under the applicable standard, the DEIR cannot be considered adequate. No. 3

B. The DEIR's Analysis of Cumulative Operational Emissions Lacks Analytic Support.

While the DEIR refers to Table 4.2-13 as demonstrating that "operation of the proposed project would exceed the project specific significance thresholds for VOC and NO_x," DEIR, § 4.2.4, p. 4.2-44, and, on that basis, reaches the conclusion that "the proposed project would have a cumulatively considerable contribution for operational emissions and would result in cumulatively significant operational impact," *Id.*, Table 4.2-13 does not illustrate those conclusions. That Table is not concerned with operational emissions, but rather graphically illustrates "Cumulative Construction Projects Peak Daily Emissions Estimates." It is, therefore, impossible to determine whether the conclusions articulated in § 4.2.4 concerning the Project's cumulative air quality impacts are in fact accurate. No. 4

C. Even The DEIR's Analysis of Cumulative Construction Emissions is Incomplete.

In Table 4.2-13, note 12, the DEIR explains that its analysis of cumulative construction emissions was based on the "LAX Master Plan Alternative D/SPAS Alternative 3," not on the project approved by the Los Angeles City Council, the combination of Revised SPAS Alternatives 1 and 9. The DEIR provides the rationale that the Federal Aviation Administration's ("FAA") required approval (of funding for the more recently approved project in the SPAS Report) had not yet been obtained. This requirement for FAA approval raises two potential issues related to air quality. No. 5

First, approval by the FAA must be predicated upon the Project's "conformity" with the air quality standards set forth in the Clean Air Act, 42 U.S.C. § 7506, *et seq.*, and in its implementing regulations, 40 C.F.R. § 93.100, *et seq.*, Determining Conformity of Federal Actions to State or Federal Implementation Plans (collectively "Conformity Rule"). The DEIR omits any analysis of the Project's conformity, and instead chooses to employ as a surrogate

project Alternative D from the 2005 Master Plan, that has long since been superseded by a vastly different project, implicating a vastly different set of activities, with concomitantly different air quality impacts, already approved by the City Council. No analysis of the cumulative impacts of the approved project, composed of a combination of SPAS Alternatives 1 and 9, is extant in the DEIR.

Second, even if Alternative 3 were still the applicable project, which it is not, Alternative 3 of the Master Plan never achieved Clean Air Act conformity in its entirety. It was only by virtue of a Stipulated Settlement of legal action brought by some of the same petitioners, *e.g.*, City of Inglewood, City of Culver City and Alliance for a Regional Solution to Airport Congestion ("ARSAC") that parts of Alternative 3 approved in the Settlement (*see* Definitions and Section V.D.1) have proceeded as far as they have. The remainder, the "Yellow Light" projects, *see* Stipulated Settlement, § V.D., were replaced by the different project approved through the SPAS process, *i.e.,* Alternatives 1 and 9. Therefore, the DEIR's reliance on Alternative 3 for its cumulative analysis of construction impacts must lead inevitably to a result of nonconformity. The analysis should, instead, be performed using the activities and timeframes planned for the current approved SPAS project, which may lead to a different, and more legally acceptable, result. No. 5

II. THE DEIR'S SURFACE TRAFFIC ANALYSIS IS INCOMPLETE.

As noted on page ES-6 of the DEIR, primary local access to the Project Site is provided by a network of streets including Pershing Drive, Lincoln Boulevard, **La Tijera Boulevard**, **Sepulveda Boulevard**, Aviation Boulevard, **La Cienega Boulevard**, La Brea Avenue/Hawthorne Boulevard, Venice Boulevard, **Washington Boulevard/Washington Place, Culver Boulevard, Jefferson Boulevard**, Manchester Avenue, Westchester Parkway, Century Boulevard, Imperial Highway, El Segundo Boulevard, and Rosecrans Avenue. Six of these primary local access arterials (La Tijera Boulevard, La Cienega Boulevard, Sepulveda Boulevard, Washington Boulevard/Washington Place, Culver Boulevard, Jefferson Boulevard) either run through Culver City or lead to/from Culver City. No. 6

The DEIR reveals that the Project, at buildout, will produce (a maximum of) 23,635 car trips per day. DEIR § 4.14.3.4.2, Table 4.14-18. Surprisingly, the impact of this increase in traffic on Culver City is not meaningfully addressed in the DEIR, even though 11% of those trips, or approximately 2,364 per day will use Sepulveda Boulevard as a conduit, Figure 4.14-2, p. 4.14-49, leading directly into, through, and out of, Culver City. An additional 11% of those trips, or approximately 2,364 per day, will use La Tijera Boulevard (which feeds into/from La Cienega Boulevard, a major north-south arterial that passes through the east side of Culver City) as a conduit leading into, and out of, Culver City.

A. The DEIR Ignores Culver City Intersections Likely to be Impacted by the Increase in Traffic caused by the Project.

The DEIR lacks any analysis of, or mitigation for, the following 13 intersections in Culver City that appear focal in the access to the Project site:

(1) Washington Boulevard/La Cienega Boulevard

(2) Washington Boulevard/Glencoe Avenue south approach (Costco driveway)

(3) Washington Boulevard/Walgrove Avenue

(4) Washington Boulevard/Centinela Avenue

(5) I-405 Southbound/Sawtelle-Matteson

(6) I-405 Northbound/Sepulveda Boulevard

(7) Sepulveda Boulevard/Braddock Drive

(8) Slauson Avenue/SR90 ramps

No. 7

(9) Overland Avenue/Sawtelle Boulevard

(10) Overland Avenue/Jefferson Boulevard

(11) Overland Avenue/Culver Boulevard

(12) Overland Avenue/Washington Boulevard

(13) Inglewood Boulevard and Washington Boulevard

Moreover, the DEIR understates the significance of the Project's impacts on Culver City intersections it does review by applying Culver City's 2% criterion of significance of increase in intersection impact, instead of the 1% criterion used by the City of Los Angeles. However, where the intersections are shared by the two jurisdictions; and where, as here, the Project is entirely within, and created by the City of Los Angeles, it is Culver City's position that Los Angeles' 1% criterion for intersection impact should be employed in analyzing impacts on the intersections in Culver City. In fact, in a letter dated October 31, 2006, in relation to the LAX Specific Plan Amendment Study, Culver City directed the City of Los Angeles to use LADOT guidelines when evaluating potentially impacted intersections within Culver City. (See attached Exhibit A.)

B. The DEIR Cumulative Traffic Analysis is Inadequate.

The DEIR's list of related projects is similarly deficient. That list omits mention of a number of projects in Culver City, as well as some in the City and County of Los Angeles. These include:

(1) The Playa Vista Buildout

(2) Sony Pictures Studios Comprehensive Plan (the Jimmy Stewart Building and all other improvements contemplated in the Comprehensive Plan)

(3) Washington/Landmark at 8810 Washington Boulevard

(4) Legado Mixed Use TOD at 8770 Washington Boulevard

(5) Office and Retail Building at 700 Corporate Pointe

(6) Parcel B at 9300 Culver Boulevard

(7) Triangle Site-Washington/National TOD

(8) West Los Angeles College Master Plan

(9) Culver Studios Amendment No. 6 at 9336 Washington Boulevard

(10) The Planned Future Development of the Marina del Rey and Via Marina Areas

No. 8

In addition, the DEIR entirely fails to address the cumulative traffic impacts of the Specific Plan Amendment Study ("SPAS") project. While the EIR for the SPAS project claims that it is purely for safety and efficiency purposes; will not increase capacity; and, thus, will not significantly increase off-airport surface traffic, the broad scope of the SPAS project and its facilitation of access for a greater number of larger aircraft, carrying a greater number of passengers, will inevitably lead to more surface traffic travel to and from the airport. It certainly would be expected that the historic and current traffic patterns will continue, which will result in a significant portion of that traffic accessing the airport through Culver City. Nevertheless, the DEIR utterly fails to account for the cumulative impacts of the Northside and SPAS projects on Culver City, and consequently requires amendment to account for the impacts of these additional projects.

Finally, the DEIR misses the opportunity to mitigate at least some of these unreported direct and cumulative impacts, as well as those already discussed. For example, the DEIR fails to mention any mitigation for the Project's impacts at the intersection of Jefferson Boulevard and Sepulveda Boulevard. Culver City requests that the DEIR be amended to include a discussion of the potential for mitigation of the Project's manifest traffic impacts on Culver City, including,

but not limited to, installation of triple left turn lanes for eastbound Jefferson traffic to northbound Sepulveda. For eastbound traffic there would be two left lanes only, one left/through optional lane, and one through/right optional lane. This operational change shall require opposed phasing for eastbound and westbound traffic, changes in signal hardware, restriping and pavement marking upstream, as well as enhanced signage.

No. 8

In short, the DEIR significantly understates both the Project's direct and cumulative surface traffic impacts on Culver City, and lacks any mention of mitigation to compensate for those impacts. Until those deficiencies are rectified, the DEIR will remain inadequate.

III. THE DEIR ANALYSIS OF THE PROJECT'S IMPACTS ON TRANSIT IS SIMILARLY INCOMPLETE.

A. The DEIR Ignores Culver City Transit.

The DEIR's transit analysis, like its surface traffic analysis, pays little or no attention to the Project's impacts on Culver City. For example, Table 4.14-1 states that no information was available concerning the Culver CityBus ("CCB"), even though the DEIR also states that CCB is one of the lines that takes travelers directly to "The Aviation/LAX Green Line Station" and "LAX City Bus Center," § 4.14, p. 4.14-10. Clearly, CCB transit information should, on that basis alone, be included in the DEIR. Further, CCB's transit service runs on Sepulveda Boulevard, Aviation Boulevard, La Cienega Boulevard, Washington Boulevard, Culver Boulevard, Jefferson Boulevard, and Century Boulevard, all of which are identified as part of the primary local access to the Project site. As a result, the DEIR should be enhanced with respect to impacts on CCB lines, both on the demand on service capacity due to trips generated by the Project and potential travel time increases due to surface traffic generated by the Project.

No. 9

B. DEIR Transit Analysis Overly Generalizes Capacity Impacts.

First, with respect to analysis of the impacts of the Project on transit capacity, the DEIR traffic study generalizes the transit capacity impacts of the Project using the overall transit residual capacity over all transit lines in the study area. However, not all bus lines are impacted equally by the trips generated by the Project. Sepulveda Boulevard (Culver CityBus Local and Rapid 6 service) is a major access to/from the airport (and the Project) and a detailed analysis should be provided on the impacts to the transit capacity along the Line 6 corridors.

Moreover, the results in Table 7, reflecting existing transit service patronage and residual capacity, are calculated on an average value of the load factor across all bus lines to estimate the residual capacity per run. However, the ridership patterns on the bus lines usually depend on commute patterns; therefore, the transit capacity impact analysis should look at the impacts to transit capacity per direction. CCB's Local 6 and Rapid 6 currently experience overcrowding in both northbound and southbound directions during peak hours, and the impacts of the Project will most likely require CCB to add more service to respond to increased demand.

No. 10

C. DEIR Uses Incorrect Methodology in Estimating Impacts.

The CMP Transit Capacity Analysis used 10% to estimate the year 2022 load factor to reflect 10 years of transit ridership growth or a rate of 1% per year. CCB, however, has experienced approximately 4% ridership increase per year since 2010. The percentage increase in the DEIR should reflect the actual anticipated average ridership growth of individual lines.

Page 160 of the traffic study, under "Provision of Additional Buses" section, proposes providing two buses for Metro Route 115 on Manchester Boulevard to bolster transit capacity and LOS in the Study Area. The traffic study used average vehicle occupancy of 1.2 people per vehicle to calculate the capacity of a 40-foot bus to remove 33 vehicles from Manchester Boulevard. Per Metro's 2010 Congestion Management Program guidelines, average vehicle occupancy of 1.4 people per vehicle should be used, and a 40-foot bus only has the capacity to remove 29 vehicles from the road. This correct number (29 vehicles) should be reflected in the traffic study and the Final EIR. No. 11

D. The DEIR Transportation Demand Management Discussion is Inadequate.

With respect to potential increases in transit travel time due to the Project, it should be noted that Table 17 shows that the Project trip generation estimates use 5% Transit Credit and 5% Transportation Demand Management ("TDM") credit. The question then arises as to the way in which these credits are derived and justified. The basis for and application of these credits needs to be more fully explained in the DEIR.

Further, the Project is taking 5% TDM credit on office and research & development. As transit is a critical component of TDM program, the detailed analysis on the Project's impacts to transit capacity should also include an appropriate portion of the trips claimed under the 5% TDM credit to calculate the full extent of the Project's impacts to transit capacity.

In addition, it is important that a Transportation Management Organization is established in order to ensure that the assumed traffic reduction attributable to the TDM measures is achieved. No. 12

Moreover, and despite the requirement that the efficacy of the TDM Program be monitored and the existence of fines for noncompliant tenants of the Project, enforcement of the TDM Program as a mitigation measure for Project impacts, will, ironically, result in increased impacts on Culver City. On the one hand, if the TDM Program is successful in diverting automobile traffic from the Project to public transit, demand on Culver CityBus lines, as on others, will increase over time. As growth in ridership on Culver City bus lines is already at 4% per year, it is most likely that Culver City will have to provide new buses to accommodate increased ridership from the Project. On the other hand, if the TDM is not as successful as anticipated in diverting traffic to public transit, then Culver City will be a recipient of increased surface traffic from the Project. Either way, Culver City is impacted in ways unanticipated, unanalyzed, and, therefore, unmitigated in the DEIR.

Additionally, the DEIR should be enhanced with respect to enforcement measures and should be expanded to include greater detail regarding the enforcement process.

Finally, since the mitigation benefits of the TDM Program are difficult to quantify (and the outcome not certain), the DEIR needs to provide a detailed analysis of the real travel time delays the buses along the corridors within the traffic study area will experience due to the Project without the TDM credit. This detailed analysis should include CCB Lines 1-7. No. 12

In summary, Culver City seeks to be part of the solution to the problem of the impacts caused by the Northside Project. We look forward to further discussions with LAWA concerning disclosure and analysis of these impacts and appropriate mitigation for them, so we can reach an amicable and mutually beneficial resolution of these issues. No. 13

Sincerely,

BUCHALTER NEMER
A Professional Corporation

By Barbara Lichman

Barbara Lichman

Email Date: 5/20/14
Name: Edward G. Keating
Email: keating@rand.org
Address: 8707 Falmouth Avenue, Playa del Rey, CA 90293

I live right near what is labeled Intersection 92 in the draft EIR. The EIR is correct, in my opinion, that traffic impact in the vicinity of my home would be minimal. Further, it should be noted that residents of my neighborhood would generally be out-bound in the morning and in-bound in the evening, running exactly opposite to the prevailing direction of traffic for workers in the Northside Plan area. I especially appreciate the fact that the plan includes no additional housing. Real estate experts I have talked to feel that having proximate jobs will increase residential property values in the area. My current residence could be quite attractive to someone working in the Northside Plan area.

No. 1

No. 2

Email Date: 5/21/2014
Name: Iggy Tester
Email: testr.w.longemailaddress@longdomain.com

Please ignore. Testing long email address.

No. 1

From:	Doug Arseneault
To:	TRIFILETTI, LISA; joan@greerdailey.com
Cc:	LAX Northside Project; "Brad Rosenheim (brad@raa-inc.com)"; EDGAR KHALATIAN (ekhalatian@mayerbrown.com); amy@agd-landuse.com; Stuart Waldman
Subject:	LAX Northside Plan Update
Date:	Tuesday, May 27, 2014 3:21:40 PM
Attachments:	image001.gif image002.gif image003.gif image004.gif

---

Lisa and Joan,

We would like to schedule a presentation on the LAX Northside Plan for our next Land Use committee meeting on Tuesday, June 10 at 8 AM. The meeting will be held at The Garland hotel (4222 Vineland Ave. North Hollywood, CA 91602). No. 1

Please let me know if you or one of your colleagues is available.

Thank you,
Doug

Douglas C. Arseneault
Senior Legislative Affairs Manager
Valley Industry & Commerce Association (VICA)
5121 Van Nuys Blvd., Ste. 208
Sherman Oaks, CA 91403
Office: 818.817.0545
Email: doug@vica.com
Website: www.vica.com

Stay connected to VICA

From: Patricia smith
To: LAX Northside Project
Subject: Hard copy
Date: Sunday, June 08, 2014 12:58:40 PM

Are hard copies of the draft EIR available for purchase. If so where can I pick one up.

No. 1

Patricia

Sent from my iPad

From: Yao, Grace
To: LAX Northside Project
Subject: public meeting at st bernard"s?
Date: Wednesday, June 11, 2014 10:21:11 AM

Is there a meeting this evening at St. Bernard's HS on the Northside Plan?

No. 1

Grace Yao
Director of Community Relations
Loyola Marymount University
1 LMU Drive, University Hall, Suite 2800
Los Angeles, CA 90045-2659
Phone 310.258.4342
Grace.Yao@lmu.edu

LETTER NO: LAXN-PC-06

LAX NORTHSIDE PLAN UPDATE

COMMENT ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE LAX NORTHSIDE PLAN UPDATE.

NAME Mo Sadrpour DATE 6/11/14

ADDRESS 7100 W 91st CITY Los Angeles ZIP 90045

Email Sadrpourmo@yahoo.Com Phone 310-529-7595

Please list the environmental issues that you are concerned with and would like to see addressed in the Environmental Impact Report. Please be as specific as possible:

This project needs to take a look at Speed Control on Loyola street between Lincoln & Westchester parkway.

- one suggestion is to have a round about at intersection of Loyola & Lafayette (Behind OTIS College).

- Also since there are lot of students from the College & Elemetry school cross Loyola there should be a cross walk at the Loyola & 91st or Loyola & Lafayette (behind OTIS College)

This is a very important safety issue that has been brought up many times duing our meetings

Additional comments:

No. 1

Mailing Address: LAX**NORTHSIDE**
C/O Lisa Trifiletti
1 World Way
P.O. Box 92216
Los Angeles, CA 90009-2216

Website: LAX**NORTHSIDE**.org
Email: LAX**NORTHSIDE**@LAWA.org

LETTER NO: LAXN-PC-07

LAX NORTHSIDE PLAN UPDATE

COMMENT ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE LAX NORTHSIDE PLAN UPDATE.

NAME Nancy Carol N. Morrison DATE 6/11/2014

ADDRESS 6350 W. 81st Street CITY LA ZIP 90045

Email Nmorgee@aol.com Phone 310 410-4430h.

Please list the environmental issues that you are concerned with and would like to see addressed in the Environmental Impact Report. Please be as specific as possible:

"I am concerned about planes being waved off" when there is an emergency with no construction, how are planes that are waved off going to be able to circle around over the neighborhood with higher construction than NO construction / buildings now on Westchester Parkway. Planes loaded with passengers have flown right over my yard + house. I could see passengers + they could see me, as well. No. 1

Additional comments:

In an emergency there must be enough room for airplanes to turn out of the way.

Mailing Address: LAX**NORTHSIDE**
C/O Lisa Trifiletti
1 World Way
P.O. Box 92216
Los Angeles, CA 90009-2216

Website: LAX**NORTHSIDE**.org
Email: LAX**NORTHSIDE**@LAWA.org

From:	Barrett, Susan
To:	LAX Northside Project
Subject:	LAX Northside Plan Update DEIR - Comments Deadline Extension?
Date:	Thursday, June 12, 2014 10:15:53 AM

No. 1

Has the comment deadline been extended beyond June 30?

Susan Barrett
BuchalterNemer, A Professional Corporation
18400 Von Karman Avenue, Suite 800 | Irvine, CA 92612-0514
Direct Dial: (949) 224-6264 | Switchboard: (949) 760-1121
Email: sbarrett@buchalter.com | www.buchalter.com

Email Date: 6/17/14
Name: Erin Wallace
Email: emwcc@aol.com
Address: 8227 Redlands Street, #8, Playa del Rey, CA 90293

I have commented in the past about the moving the north runway closer to my community. In my mind, these two projects - Northside development and North runway expansion - are interdependent. If you move the runway, Westchester Parkway may be affected by the possible movement of Lincoln. This could block through traffic to the businesses you are proposing in the Northside development. If you move the runway, future businesses along Westchester parkway could be affected by moving the runway closer through noise and air pollution. It also seems possible these businesses would be within the required buffer zone. It seems to me that neither are a good idea, both together are a horrible idea, and it really should be a one or the other situation. To my knowledge there has not been a final decision on the runway project, therefore I am not sure how you can move forward on this project without knowing the outcome on the other.

No. 1

Email Date: 6/17/14
Name: Nathanael Nerode
Email: emwcc@aol.com

This is a comment regarding the people mover and CONRAC proposals. The CONRAC proposal demolishes an entire neighborhood, which is not going to happen and is a mistake. The people mover proposal is asininely awful, and ignores best practices from other people movers -- it should be a loop through the terminals stopping at every terminal, like people movers are in every other airport in the entire world. I really wish LAX had an airport people mover and a consolidated rental car center, but YOU ARE DOING IT WRONG. Please redesign the people mover to be a loop through the terminals and relocate CONRAC onto one of the giant existing parking lots. Thank you.

No. 1

From: Linda ching-ikiri
To: LAX Northside Project
Subject: Add"l comments about traffic
Date: Friday, June 20, 2014 10:12:53 AM

Dear team members,
I am the person who raised the issue about the 105 corridor competing with the El Segundo aerospace traffic. I am sorry that I forgot to mention that the bottleneck with be at the 405 north/105 west transition. Once drivers get on the 105, then they probably will have a clear path down Imperial to Pershing.

I think the traffic team may need to see for themselves the severity of the bottleneck. I have driven the 405 southbound at ~9:15 a.m. (Thursdays) and seen traffic on the other side gridlocked farther down the road than one would expect at that time of day. Also, my office overlooks the 105 and I can see the traffic trying to exit at Sepulveda in the mornings--horrific!

I can't remember how the alternate routes were ranked, but I'm sure those "letter grades" are bound to go down!

Sincerely,
Linda Ching-Ikiri

No. 1

From:	Gregg Aniolek
To:	LAX Northside Project
Subject:	Suggestions/ ideas for Pershing to Falmouth section of LAX Northside
Date:	Monday, June 23, 2014 8:22:52 AM
Attachments:	JETPETS ideas.pdf

Hello Lisa,

No. 1

I'm just following up with an electronic copy of my presentation I gave you last Thursday at the PLUC meeting.

Let me know if you want anything clarified. Hopefully David at JETPETS will give you some feedback.

Gregg Aniolek, Residential District #2

JETPETS

David Hasenauer
President

9111 Falmouth Avenue
Playa Del Rey, CA. 90293-8617
310.823.8901

Presentation by
Gregg Aniolek
Neighborhood Council Member, Residential District #2
310.429.4199

Location

Future Plans for Area

LAX Northside Plan

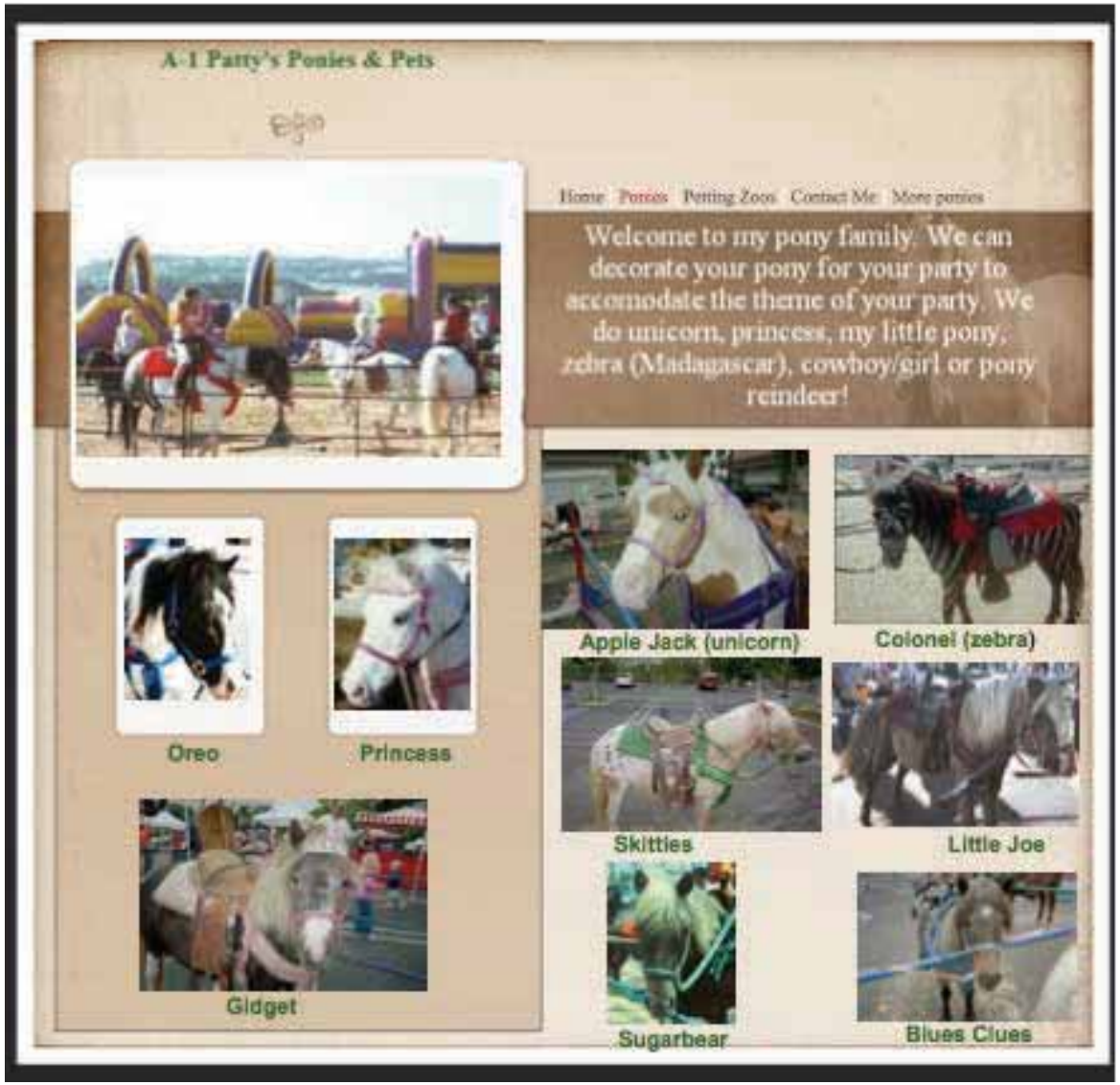
- Opportunity for JETPETS
- More public exposure
- Utilize area adjacent to JETPETS
- Possible larger animal ring in addition to dog park?
- No quarantine animals from JETSPETS in the ring
- Pony rides or petting zoo for kids?
- Santa Monica has pony rides…

No. 1

Pony Rides – Main St. Santa Monica

Local Pony owners

- www.pattysponies.com



Other ideas/suggestions

- Replace ugly chain link fences and barbwire around the perimeter with nicer barrier
- Level out lands around JETPETS so it can be better viewed
- JETPETS to provide some form of support for animals owners who bring them to the area
- Tours of JETPETS for public
- Allow people to view the process of importing and unloading horses arriving from LAX

From:	Bryce Sheldon
To:	LAX Northside Project
Subject:	LAX Northside Hotels
Date:	Wednesday, June 25, 2014 7:40:30 AM
Attachments:	image001.jpg Quals.pdf

Hello Lisa,

My name is Bryce Sheldon, I represent Integrated Services Corp (ISC), a New York City

hospitality procurement and construction management company specializing in 3, 4 and 5 star

hotels, resorts and casinos. During the 27 years of our operations, we have

successfully completed over 1,100 hospitality projects all over the world.

No. 1

We would like to bring our expertise and assist you with your procurement and or construction

management needs for the LAX Northside Hotel in my home town of Los Angeles California.

I have attached our qualifications material for your review. We will be more then happy to meet

with you and your team. Please let me know if you have any questions and enjoy the rest of your

week.

ISC

Bryce Sheldon

Marketing

Business Development

220 Fifth Avenue, Suite 1301

New York, New York 10001

T 212.532.5300 ext. 202

F 212.532.1990

C 714.244.8400

www.iscnyc.com

From:	noreply@salesforce.com on behalf of Ashley Wingate
To:	LAX Northside Project
Subject:	Complete Signs - National Sign Company
Date:	Thursday, July 10, 2014 12:50:04 PM
Attachments:	Complete Signs Ashley_pdf.html

I noticed your involvement on a project on Construction Wire.

We're a national sign company, Complete Signs. Please find some info about us attached.

Our approach to managing your identity assures a streamlined project management process, uniform look and cost savings.

Please don't hesitate to let me know if I can put together a proposal for the exterior and interior signage for your construction project.

Please email me at ashley@completesigns.net or give me a call or text at 334-618-1361 if I can assist in anyway.

Thank you.

No. 1

Ashley Wingate
ashley@completesigns.net
Phone- 334.618.1361
Fax- 334.556.0218
www.completesigns.net

From:	Dawn
To:	LAX Northside Project
Subject:	NO - to LAX Northside plan
Date:	Wednesday, July 16, 2014 1:42:01 PM

To whom it may concern,

I am adamantly opposed to the LAX Northside plan. LAWA has NOT been a good neighbor to the surrounding PDR community. No. 1

To infer the noise levels would not increase for us directly behind Westchester Parkway is simply a fallacy. No. 2

Planes have been flying closer to the North for some time now. While my patio door was replaced, my windows were not and the noise levels continue to increase.

In addition, I am opposed to any development which would run along Westchester Parkway from Sepulveda to Pershing. No. 3

This is NOT a business district, this is a neighborhood. No. 4

Dawn Goodwin
Manitoba West
8160 Manitoba St. #113
Playa del Rey, Ca 90293

From: Keri Mallozzi
To: LAX Northside Project
Subject: WiFi calling - the solution MDU/ MTUs have been waiting for
Date: Wednesday, July 16, 2014 10:40:13 AM

Please attend our next exciting web event: "WiFi Calling Is Here: The Impact on MDU/ MTUs". **REGISTER TODAY** or See below for details.
Need Managed WiFi? Need CellBoost? Contact Us Today: **877-768-6687**

Is this email not displaying correctly? View it in your browser.

Lisa Trifiletti,

Sign up for our next webinar:
"WiFi Calling Is Here: The Impact on MDU/ MTUs"
Wednesday August 13, 2014 1 PM EST
Duration: 60 minutes

Get your property ready for WiFi calling!

iPhone support for seamless WiFi calling is coming in fall and T-Mobile and Sprint both support WiFi calling on Android (and soon Apple) devices. **You need to have property-wide WiFi coverage for your residents.**

Give residents with WiFi calling the ability to place calls from anywhere at your property where there is WiFi coverage!

Need 24/7 Managed WiFi for your property? Request a quote today! or **call Keri Mallozzi: 203-523-5231**

Need Indoor Cellular Coverage?

Get **CellBoost™.** Our hybrid-DAS system is **a fraction**

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Schedule a products & services webinar with a member of our team today to learn more and get your wireless questions answered.

Spot On Networks is the most trusted name in WiFi to the MDU/ MTU space and we can't wait to show you why!

Blog: WiFi Calling on iPhone is Here

A lot sooner than expected... at least if you have iOS 8 beta 3. At the World Wide Developers conference in June, Apple announced that WiFi calling would soon be coming to the

No. 1

of the cost of a typical DAS AND we handle all aspects of carrier approval so you know that your indoor voice coverage system is in compliance with FCC regulations.

Watch this video to learn more:

iPhone. Apple delivered on that promise Monday - releasing WiFi calling in iOS 8 beta.
Read more

wi-fi calling on iPhone

Contact Me Today!
Keri Mallozzi - Account Executive
203-523-5231
Email Me

Our mailing address is:

Spot On Networks
55 Church Street
New Haven, CT 06510

From:	Offinitz, Allen
To:	LAX Northside Project
Subject:	Northside Development
Date:	Thursday, July 17, 2014 10:35:57 AM
Attachments:	image001.jpg

I am a resident of Manitoba West in Playa Del Rey and wish to comment on the proposed development plan. I also attended the meeting that was held at St. Bernard High School some time ago.

1) While I understand the position that LAWA is in regarding development, I think a buffer between the north runway provides a good safety margin. The Westchester Parkway provides local residents an alternative to using Manchester Blvd. as East/West thoroughfare. Adding commercial development will only increase traffic in the area. No. 1

2) I commend the planner's decision to limit height to 60 feet. I assume that there have been marketing studies that indicate the area needs more office space and retail development. I am sure that no one wants to see vacancies and with Marina Del Rey to the north and the large retail complex on Sepulveda at Rosecrans, one wonders what retailers would want to locate near a busy airport? No. 2

3) Finally, NO to the soccer field. A big **YES** to the dog park. While I am not a dog owner, I feel bad for the pet owners that only have a limited amount of grass along Manitoba Street and Falmouth to walk their dogs. I also think a **play area** for young families would be a much better use of the space rather than a soccer field. I see young Mom's having to play with their children on our tennis courts, since there is no other open space to allow them to run, skate or learn to ride their bicycles. With more young families residing in the condominium and apartment complexes in the area, I would think there would be much greater support from the local residents. No. 3

Thank you for allowing me to voice my opinions.

Allen Offinitz CSP, ARM
Senior Risck Control Consultant
Risk Services Division, Western Region
HUB International Limited
6701 Center Drive West, Suite 1500
Los Angeles, CA 90045
(310) 568-5967-Office
(310) 663-0280-Cell
(310) 733-1752-Fax
allen.offinitz@hubinternational.com

From:	janet
To:	LAX Northside Project
Subject:	Comments for Lax Northside Plan
Date:	Thursday, July 17, 2014 10:09:40 PM

To Whom it May Concern:

This is in regard to the Draft EIR for the LAX Northside Plan. I live at Manitoba West located on Manitoba Street. It is my understanding there are plans to either have a dog park or soccer field located on the parcel located on Westchester Parkway and Falmouth Street.

No. 1

My preference would be to select a dog park, since there are a lot of people in the neighborhood that own dogs and would have a park to walk their pets. If a soccer field was located on that parcel, I believe it would bring a lot of outside traffic to the neighborhood,more noise, and litter. I think the dog park would better for the area because it would draw a majority of the people from the surrounding neighborhood.

Thank you for letting me provide my comments.

Janet Okawa

From: Mo Sadrpour
To: LAX Northside Project
Cc: Mo Sadrpour; Bonnie Sadrpour
Subject: 91 Street Neighborhood comments and concerns on LAX North side EIR
Date: Thursday, July 17, 2014 8:22:59 PM

TO: LAX Northside EIR c/o Lisa Trifiletti, LAWA

Our 91 Street Neighborhood is directly North of the LAX Northside. The alley South of our homes is the LAX property boundary. We appreciate the opportunity to respond to the proposed LAX Northside Project. Our 91 Street homes, our lives, our neighborhood's future is critically and directly impacted by this plan. We look forward to actively continue our relationship with The LAX Planning Committee.
Upon reviewing the LAX Northside Plan EIR and its impact to our 91 Street Neighborhood, our most important security concerns have been addressed and mitigated with the proposed "strong" buffer. No. 1

Security and safety go hand in hand. Our current issues are with the volume of traffic, the speed of traffic through the neighborhood streets (cut-through traffic has been a major problem before when Westchester Parkway was under construction). Pedestrian traffic should have marked/painted zebra crosswalks for the number of students attending the neighborhood schools, including Otis College. Steps should be taken by The Project Planning Committee to create mitigations to reduce the speed of traffic, create safe routes for pedestrian traffic, limit access from Loyola and provide controlled access, provide lighted, zebra crosswalks for pedestrian traffic, and clearly provide safe riding for bicyclists. No. 2

Public parking, for the designed recreational use of the Northside, needs to provide for the mixed uses planned to create additional public recreation areas – bicycle traffic, after school sports team traffic, pedestrian traffic, work traffic, to name a few – and, again, security and safety concerns must be thoughtfully planned and implemented. This is very crucial. Having designated parking will eliminate the neighborhood being used for recreational and added through traffic. No. 3

Most of 91st Street does run parallel to Manchester. 91St Street is and has previously been used as a major thoroughfare. Access control to the development from 91 Street, Loyola, La Tijera, and Lincoln needs to be studied further. No. 4

Our other major concern is that during the development and construction No. 5

period, we will be faced with rodents and pests from the field. REQUEST: Rodent and Pest control continuously during all construction and for the entire construction time. REQUEST: Dust control measures during construction to include resources for car cleaning/washing and other nuisances caused by construction. REQUEST: Noise control measures continuously during the entire construction time. REQUEST: green 8-foot security fence on buffer area, north of Northside Project and South of 91 Street alley. REQUEST: Continued and ongoing maintenance of buffer area during all construction and as a responsibility of future Northside occupants. REQUEST: Detailed plans to control and mitigate the increased traffic on 91 Street. REQUEST: Security and Safety for all.

No. 5

Regards.
Mo & Bonnie Sadrpour
7100 W. 91 Street
Los Angeles, Ca 90045
(310) 645-2342

From: rsauschuck@ca.rr.com
To: LAX Northside Project
Cc: rsauschuck@ca.rr.com
Subject: soccer field (AREA I) (NO)
Date: Saturday, July 19, 2014 7:48:03 PM

Dear Lisa Trifilleti,

My name is Richard J. Sauschuck home owner 8160 Manitoba St. Playa Del Rey, Manitoba West Condo Complex.

As a home owner I am aganist a soccer field being constructed in area (1) next to the jet pet's service road. — No. 1

Building a soccer field in the back yard next to thee (3) largest condo compexes in P.D.R.Seagate Village, Manitoba West, Pacific Club would cause.

1.Noise pollution to the condo Homeowner's unit's. — No. 2
2.Overflow of street parking on Falmouth & Manitoba Street. — No. 3
3.Quality of life would be damaging to the Home owner's of these Condo Complex's. — No. 4
4.Property Value would be effective due to noise.. — No. 5
5.Our property would be over looking public rest roooms that smell. — No. 6

Homeowner's in this area are being subjected to noise from Saint Bernard's athletic field and there parking lot (7) day's a week. The school is leasing out ther athletic field to event's from 8am to 530pm and ther parking lot to the motion entertainmememt industry. The condo owner's do not need more noise from 150 soccer fan's screaming in our back yard. — No. 7

Area (1) east of Saint Bernards high would be the proper place for the contruction for the soccer field, the noise would be far away from the Homeowner's. — No. 8

Also, area (1) on the jet pet's service road has been used by dog walker's for the last (30) year's by Playa Del Rey resident's, I strongly support a dog park to be construted ther, not a soccer field.

Sincerely,

RICHARD J. SAUSCHUCK

DANNA COPE
8219 Reading Avenue
Westchester, California 90045
310 641-2503
dannacope@gmail.com

July 20, 2014

Lisa Trifiletti, Director
Environmental and Land Use Planning
Los Angeles World Airports
1 World Way, Room 218
Los Angeles, California 90045
laxnorthside@lawa.org

Re: LAX Northside Plan Update DEIR

Dear Ms. Trifiletti:

The amount of outreach to the community and incorporation of comments and concerns that has been achieved through this DEIR process is outstanding and very much appreciated. No. 1

However, there are a few issues that need clarification.

Using 2010 traffic data is not appropriate for this study. In 2010 this area was still in the throes of a recession. Since 2010 there has been a substantial upsurge in traffic, especially in the Westside and South Bay sections of Los Angeles County. Even since 2012 there has been a sizeable traffic increase in these areas over and above the increase in the rest of Southern California. Therefore, using an increase of 1.7% does not adequately reflect the actual traffic in this area as of 2014 (DEIR Executive Summary, page 4.14-16, discussion of Table 4-14-3). A new traffic study showing the actual, current traffic is required. No. 2

The traffic studies used in the DEIR did not include ongoing development at Playa Vista which will heavily impact the flow of traffic on Lincoln Blvd and needs to be factored into the Final EIR traffic figures. The approved large apartment complex at 74th Street and La Tijera Blvd was missing from the DEIR listing of other proposed projects. It will add greatly to the slowing of traffic at the 405 Freeway on and off ramps at La Tijera as well as other intersections and needs to be included in the Final EIR. No. 3

The DEIR states that there will be 15 intersections rated as poor or LOS E at peak hours (4 AM and 11PM) and 14 intersections as failed or LOS F at peak hours (3 AM and 11 PM) with mitigation measures (*Traffic Appendix, Table 20, page 228*). This represents an increase of 6 LOS E and 8 LOS F intersections (*comparing Traffic Appendix, Table 5, page 45 and Table 20, page 228*). These intersections are the same ones funneling traffic into LAX; impeding the traffic flow into and around the airport should not be the result of the LAX Northside development. More mitigation measures must be created or the density of the plan should be reduced. No. 4

It would be beneficial if a summary table, similar to Table 20, were to be included that listed the levels of service for existing conditions, the project without mitigation, and the project with mitigation. No. 5

After mitigation measures, the total weekday number of project trips is expected to be 23,126. Less than 19% (1,935 AM, 2,476 PM for a total of 4,411) are considered to be peak hour trips per day out of the total 23,126. Because a large portion of the development will be office space with weekday operations and some of the retail, recreational, and commercial traffic will also be during peak hours, 19% is far too low. No.6

Traffic mitigation must: include new transportation systems, improve traffic signage and lights, be affordable for riders/drivers, serve more than the project area, interlink with existing transportation services, protect the residential areas, and accommodate pedestrians, bicycles, and the handicapped. No. 7

The intersection of Sepulveda Blvd and Westchester Parkway is the first opportunity northbound traffic on Sepulveda will have to enter the LAX Northside area by making a left turn onto Westchester Parkway. It is already a dangerous spot for pedestrians and has the potential for traffic waiting to make the left turn to back up into the northbound Sepulveda traffic, especially in the AM peak hours. There are two very highly utilized ATMs at the northwest corner of this intersection with cars pulling in and out of street parking spaces adding to traffic congestion. Turn signals and timing need to be improved at this location. No. 8

The Lincoln Blvd egress/ingress to Westchester Parkway needs to be redesigned to allow smoother, safer, and faster transitions between the roadways. No. 9

The entrance/exit to/from La Tijera/Westchester Parkway will carry very heavy traffic to and from Sepulveda. Maintaining access to residential streets must be included. Noise buffers to shield residential areas from surface traffic should be included. No. 10

The residential areas on Falmouth Ave and Loyola Blvd north of Westchester Parkway need to have protection from excessive LAX Northside traffic. No. 11

Ongoing security must be provided for all residential areas abutting LAX Northside. Parking in the residential areas and cutting through them by foot to gain access to the project must be prohibited. No. 12

Building permits should include instructions stating that all structures should be constructed to provide a sound buffer between the airport and the residences. Currently airport noise tends to travel along the La Tijera entrance/exit from Westchester Parkway directly into the residences north of 88th Street. No. 13

Building permits should also require that more parking spaces be required than the Los Angeles City code currently, and inadequately, requires. The City allows tandem parking and far too many compact spaces. No. 14

Strict requirements and enforcements must be included in all construction permits that adequately address the problem of fugitive dust and particulate matter spreading into residential areas and across the airfield from construction sites. (Currently in Area 11 there are mounds of dirt which are not covered, are higher than the surrounding fence, and the material attached to the fence to prohibit dust and particulate matter from escaping is flapping uselessly in the wind rather than acting as a barrier.) No. 15

Ongoing security must be provided for all residential areas abutting LAX Northside. Parking in the residential areas and cutting through yards by foot to gain access to the project must be prohibited. No. 16

Security, maintenance, and upkeep of the open spaces should be a permanent LAWA responsibility. No. 17

Having the area between Falmouth and Pershing remain as open space with recreational uses is crucial for the community. If the water agency cannot or will not pay to use the area underground at this location as a water storage area, other ways to maintain it as open space need to be investigated. Or there needs to be an agreement with the FAA that it can remain as open space. No. 18

Although the overall density of this project is much reduced from the EIR approved in the 1980s, the projected traffic this development would cause and the impact it would have on the surrounding communities and on LAX require that further density limitations must be studied. No. 19

I look forward to participating in the ongoing EIR process.

Sincerely,

Danna Cope
8219 Reading Avenue
Westchester, California 90045
310 641-2503
dannacope@gmail.com

From: principal.stbernardhs@gmail.com on behalf of Dr. Cynthia Hoepner
To: LAX Northside Project
Date: Monday, July 21, 2014 1:40:47 PM

Dear Airport Neighbors and LAWA,

I am writing on behalf of St. Bernard High School (SBHS), in support of a plan that would benefit the entire surrounding community. The Northside Plan as it stands would enrich and contribute to the Westchester/Playa del Rey neighborhood. It is our hope that an approved plan would open up more space both for our own students and for community members to use on the weekends and after school hours. The Northside Plan includes recreation space on the land immediately adjacent to SBHS. Our plan is to partner with LAWA and take responsibility for developing that recreational space.

The plan we support would include: a football field with a regulation-sized track, a soccer field, a softball field, expansion of the current baseball field (with the closing of Cum Laude Road), a children's play area, a small dog park, and a concession area to serve all users of the larger facility.

No. 1

This proposed plan would be a win-win: more field space for the school, and a shared-use of the fields and space for families in the neighborhood. The same model exists in surrounding communities: Mira Costa HS, for example, shares its renovated track and fields with organizations including AYSO, BCS football, lacrosse leagues, and individual members of the community who can be found walking and running on the track during after school and weekend hours.

We urge you to consider a plan that would benefit many.

Thank you,

Dr. Cynthia Colon Hoepner
Principal
St. Bernard High School
Playa Del Rey
(310) 823-4651
x102 for Executive Assistant, Alison Guerrero (aguerrero@stbernardhs.com)
(310) 827-3365 fax

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http://stbernardhs.givezooks.com

LETTER NO: LAXN-PC-23

From: efaelten@ca.rr.com
To: LAX Northside Project
Subject: Proposed Soccer Field in PDR
Date: Monday, July 21, 2014 12:10:21 AM

To Whom it may concern:

My name is Eion Faelten and I am a homeowner in Playa del Rey. I am adamantly opposed to the proposed soccer field on the property adjacent to Falmouth and Manitoba otherwise designated Area 1. My objections are for a variety of reasons as follows. No. 1

1) Excessive noise, pollution and unneeded congestion associated with such events. No. 2
2) Playa del Rey is already under attack by a surge of vandalism, auto break ins, and burglaries associated with the typical undesirable elements such a facility has been known to attract.(I only need reference the chaos that occurs on the 4th of July as gangbangers and other neer-do wells traipse through our neighborhood). No. 3
3) It is a known fact that most of the people using such a facility will be imported from other areas and won't add anything positive to our neighborhood so I ask why should my tax dollars go to support this? No. 4
4) I think it is safe to say that the proponents of this come from out of PDR and are exercising the well known NIMBY principle. No. 5
5) In short such a facility should be located where the main participants are located and not imposed on our neighborhood which may be politically incorrect but needs to be said. No. 6

So in closing I suggest you rethink locating your facility on us because we can very well live without it and don't want it. No. 7

Sincerely,
Eion Faelten

From: Garrett Smith
To: LAX Northside Project
Subject: Draft EIR Northside Development
Date: Monday, July 21, 2014 12:30:03 PM

Dear Lisa Trifiletti,

Please consider my comments regarding the Northside Development . My immediate primary concerns regard construction noise, hours of construction, off-site parking for both development and construction. Through traffic on Emerson Avenue and transportation. Please reference the list below. No. 1

1. All construction noise, operations and material handling be done durning normal hours as specified by the city of Los Angeles. Monday through Friday 7:00 a.m. to 9 p.m. Saturdays 8:00 a.m. To 6:00 p.m. Sundays no construction. Per 41.40. LAMC No. 2

2. Vehicle loading or unloading times, same as construction hours. No. 3

3. All related parking be on site. No. 4

4. No through access on Emerson Street except for emergency vehicles (LAFD) that currently use it now. No. 5

5. Permit or restricted parking be offered to residences between McConnell and Sepulveda Westway and Manchester on the north on a block by block (as approved by residents) basis paid for by The Northside Development perpetually. LAWA will pay for any study necessary to obtain preferential parking permits. No. 6

6. A transportation center should be integrated into the development to include connections to the Metro 115 route, the Big Blue bus route 3 and the Greenline as well as the new ITF Intermodal Transportation Facility. Connections to the bus lines should be direct and not just nearby as stated in the draft EIR. No. 7

7. The additional bus being provided to Metro Route 115 should be CNG or electric. The bus provided must run the entire length of Route 115 from Playa Del Rey to the Norwalk station, this is called the long or extended route. No. 8

8. The Northside Development should also provide an additional north-south bus for the Big Blue line which is Route 3. It should also be CNG or electric. No. 9

9. A factual traffic study should be done for Culver Boulevard, Vista Del Mar and Nicholson in Playa Del Rey. The traffic study in the draft a EIR does not reflect the actual traffic conditions for that area. No. 10

10. If Lawa Police relocates their headquarters to area 12, the square footage of their building should be included in the 2,300,000 ft. of the total project. Since every trip to and from the headquarters will be a new trip, this should be reflected in the new traffic study in the Final EIR. No. 11

11. In areas 4 through 9 designated for airfield support, direct access to the air field should be used instead of Falmouth Avenue as much as possible. The hours of operations that vehicles exiting on Falmouth Ave. should be the same as the construction hours. Turn restrictions should be put on all vehicles exiting that location, right and left turn only, no through traffic. No. 12

12. Playa Vista as a major development should be included as a related project. No. 13

13. The Northside Development should not receive any transit credits for lines that do not directly connect to the project. No. 14

In general I find the LAX Northside Development to be a project that the community can support if the impacts of this project can be kept to a minimum. A big plus would have Otis graduate studies across No. 15

No. 15

the street from their current location. The additional park space and dog park is a must. I love that landscaping and lighting in the draft EIR, very nice.

Thank you for considering my comments, I look forward to working with you in the future.

Sincerely,

Garrett Smith
6857 West 85th Place
Westchester, CA. 90045
310-592-3680
Garrettsmith@ca.rr.com

Sent from my iPad

From: Kent Strumpell
To: LAX Northside Project
Cc: Backstrom Paul; Nat Gale; Jacobberger Jeff; Mowery Michelle; Somers David; Jusay Tony; KOONTZ, CHRISTOPHER
Subject: LAX Northside DEIR comments
Date: Monday, July 21, 2014 2:51:47 PM

LAX Northside Draft EIR Comments

While the LAX Northside plan (the Plan) as described in its DEIR has many encouraging elements, such as a reduction in size compared to previous plans, careful buffering of residential areas, and community serving features, it is still primarily a suburban office-retail development with access heavily dependent on motor vehicles and their attendant energy consumption and greenhouse gas emissions. This is disappointing given that new development of this scale has a special opportunity and responsibility to incorporate designs that can better prepare us for a future where resources will be more scarce and imperatives to avert the catastrophic dimensions of climate change will become ever-more-essential. With this in mind, the following comments are intended to encourage changes that will make the project more sustainable in these regards. No. 1

1. The project does not have convenient and pervasive access to public transit

The project is essentially isolated from regular, convenient public transit service. A better transit access plan could greatly improve the proposed project's ability to meet greenhouse gas mitigation goals. LImited transit access planning for the project is frustrating because of the availability of numerous existing transit lines in the vicinity but just out of reach. The nearest bus lines are on Sepulveda and Manchester Boulevards and many parts of the project will be so far from existing transit stops that walking to them will simply not be feasible for most people. This is further compounded by the intention to prevent bicycle-pedestrian linkages to the north, which, if allowed, could provide easier access to bus stops on Manchester.

The proposal to fund the purchase and operation of two additional buses for Metro bus line 115 is admirable but does not solve the basic "first mile-last mile" problem. It is also admirable (but should really be an obvious requirement) that the Plan includes locating an LRT station somewhere near it's eastern edge, if and when such a line is funded and built. But again, this will be of limited value if those who would like to use it cannot get to the LRT station conveniently at all hours. Plus, an LRT line that would be served by an on-site station is far from certain, with no funding or plans in place. No. 2

Recommendations for 1.

Therefore, the project should assure that employees, patrons and visitors arriving at nearby transit stops have regular, convenient access to the project's varied locations throughout day and evening hours (note that employees of the "creative" workplaces envisioned often work well beyond normal business hours). Such transit access may come in the form of a regular, all-hours shuttle or a new Dash bus route on Westchester Parkway connecting to nearby intermodal transit facilities. In fact, the project's linear form, with all parcels within close proximity of Westchester Parkway, lends itself to a simple service route.

2. Bicycle improvements planned will not meet the needs of cyclists of No. 3

diverse abilities and are inconsistent with the goals of the City of Los Angeles Bicycle Plan

The existing bike lanes on Westchester Parkway, next to high-speed traffic, are not perceived as a safe and comfortable bike route for many people, creating a significant barrier to bicycle use. Because the project is still in the conceptual design phase, this is an ideal opportunity to incorporate more inclusive cycling options to address the needs of a broad cross-section of potential bicycle riders, an objective of the City of Los Angeles 2010 Bicycle Plan.

Recommendations for 2.

One solution would be to widen, pave and stripe all or part of the planned gravel trail in the Paseo to accommodate cycling by those who do not feel safe using the on-road lanes. Crossings at Falmouth, Loyola, etc. should also include features to provide safety to both cyclists and pedestrians at those roads. This improvement would provide a multi-use trail that less-confident cyclists could use while the existing bike lanes on Westchester Parkway would accommodate faster riders. This would also provide accommodation for strollers, wheel chairs, skaters and push scooters, all of which are activities that would be compromised if the path was made only of a gravel material. The EIR should also consider if the proposed gravel path would meet ADA requirements. Observations of existing paths, such as on Culver Blvd., demonstrate that the majority of pedestrians choose to walk on the paved bike path there rather than the decomposed granite trail. No. 3

Another strategy the Plan needs to include is to provide bikeway improvements that will enhance bicycle connectivity to the surrounding community. Pershing, Falmouth, Loyola, Lincoln, La Tijera and Sepulveda are all streets that could provide bicycle access. The plan should describe how intersections, entry points and driveways will provide safe and convenient bikeway linkages to the project.

Finally, the project planners and consultants should contact and work with City of Los Angeles Bikeway Program personnel within LADOT and DCP to assure that the proposed LAX Northside plan is taking full advantage of bicycle transportation opportunities and is consistent with prevailing plans and regulations. Please contact Michelle Mowerey at LADOT (213-972-4962 Michelle.Mowery@lacity.org) and David Somers (david.somers@lacity.org) at DCP.

3. The Plan does not provide for sufficient bicycle connectivity to nearby transit lines

As noted above, existing and proposed public transit improvements intended to serve the project are located too far from the majority of the project area to be a viable option for most people. Bicycles can be an excellent feeder to transit lines but only if patrons feel comfortable cycling between transit stops and their destinations. Such enhanced access is a goal of Metro's Bicycle Strategic Plan.

Recommendations for 3. No. 4

Features should include:

- As noted above, a multi-modal, off-road trail within the planned Paseo, suitable for cyclists who would not ride on Westchester Parkway.
- Preservation of bike lanes on Westchester Parkway and Pershing Dr.
- Secure long and short-term bicycle parking at primary transit stops and within the Project.
- Showers, lockers and secure bike storage in new buildings per City building codes.
- Promotion of bicycle commuting as a required element of a more ambitious TDM

plan (see 5, below).
- Contact Metro bike program staff for best practices and resources on bicycle and pedestrian access plans in station areas. (Tony Jusay, 213 922 3446, JUSAYA@metro.net)

No. 4

4. The project lacks non-motorized access to Manchester Blvd. and the surrounding residential areas between Lincoln Blvd. and Falmouth Ave.
Residents who live immediately next to the proposed project have expressed their desire that all automobile, pedestrian and bicycle access between the project and adjacent residential streets be prevented. Of course car traffic should not be allowed to burden neighborhood streets, but the benefits of bicycle and pedestrian connectivity far outweigh the remote possibility of the problems anticipated. These benefits include:
- Allowing easier access for the whole community to the many community-serving amenities proposed, including healthful physical activities.
- Reducing the need to drive to the project and reducing the need for parking there.
- Enhancing access between the project and transit lines on Manchester Avenue.
- Possible emergency access routes between the project and locations to the north.

No. 5

The ability to get around locally without needing to drive is a benefit that will only become more important over time as the need for healthful activity, resource conservation and greenhouse gas reductions become more urgent.

Recommendations for 4.
Therefore, the Plan should include and preserve bike and pedestrian connections to the surrounding community at Stanmoor Dr. and Rayford Dr., even if these are not immediately opened due to some neighbors' opposition at the present time.

5. The project needs to require stronger TDM programs for employees who will work there
Transportation demand management programs can achieve valuable reductions in private auto use for projects of this nature. However, the Plan only factors in a very modest 5% trip reduction for this. Far higher levels of TDM participation, on the order of 20%, are achievable. The full potential of an ambitious TDM program should be a required element of the proposal, not just a possibility.

No. 6

Recommendations for 5.
In order to achieve the highest possible trip and GHG reductions, the Plan should commit to a TDM participation level of 20%. The Plan should also commit to monitoring protocols to assure that TDM targets are being met and include procedures to increase participation if they aren't.

6. New construction and urban design does not meet high enough levels of green building and sustainable urban design practices
The project's commitment to sustainability is encouraging, but CalGreen Tier One is far too modest and sacrifices energy saving and sustainability potentials that are needed NOW. Also, because of the scale of the project, it should strive to meet LEED ND (Neighborhood Development) to better address sustainable urban design, mobility and land use sustainability considerations. A suburban-style, automobile-dependent plan is simply unacceptable in the face of urgent environmental, conservation and climate change concerns. The plan already incorporates many desirable features in this regard but is lacking in many ways.

No. 7

Recommendations for 6.
A much higher CalGreen or LEED plus LEED ND or equivalent should be a requirement of all design, site plans and construction.

No. 7

Thank you for this opportunity to comment. Please don't hesitate to contact me if you have any questions or if I can direct you to any contacts or resources that may be of use.

Kent Strumpell
6483 Nancy St.
Westchester (Los Angeles), CA 90045
310-215-0114

cc: Councilmember Mike Bonin
Mayor Eric Garcetti
Michelle Mowerey, LADOT
David Somers, DCP
Tony Jusay, Metro
Jeff Jacobberger, City of LA Bicycle Advisory Committee

Email Date: 7/21/2014
Name: Lore Pekrul
Email: elpe1@earthlink.net
Address: 7822 W. Manchester Ave., Playa del Rey, CA

The great scarcity of open-space acreage within several miles of coastline along Santa Monica Bay places the LAX Northside Plan area in a unique, remnant class of its own. While the present plans are an improvement over the 1980s plan, they come nowhere near where they should be—and it is indicative that the planning process has been governed by the out-dated requirements of the governing LAX Plan and Specific Plan.

No. 1

The value of the land extends far beyond a simplistic "fair market value" return conception. The land, protected, could be used as a lever to ensure revitalization of the Westchester business district east of Sepulveda—as well as similar alignment with inland areas of Inglewood. An appropriate LAX Northside plan should retain most open space as habitat—perhaps protected or punctuated by several small scale (but highly significant) corporate headquarters, built to LEED Platinum, Net Zero Energy or Living Building Challenge standards, characterized by a car-free nature, and acting as a catalyst to reduce car dependency in local communities. A well sited soccer field would also seem appropriate, but only if accessible by community trams deployed from neighboring areas.

No. 2

The incorporation of community feedback into the plan is extremely important. However, it is equally important that the plan reflect leading edges of green urban land use scenarios—both theory and practice. This is not entirely the case. Designers can only design as well as the client will allow. As client, LAWA should call for the furthest cutting edge of design and practice—including new ways of seeking a return on value. An economic relationship among Westchester business districts, neighboring districts in Inglewood and the LAX Northside Plan area could be put into place such that the economic return for the common revitalization district would exceed what has been envisioned—perhaps with flows of capital returns moving from inland areas that benefit from a stellar LAX Northside update.

No. 3

From: Matthew Hetz
To: LAX Northside Project
Cc: Hetz, Matthew
Subject: Recreation
Date: Monday, July 21, 2014 9:58:53 PM

re: LAX NORTHSIDE

I find troubling the proposal for athletic fields and exercise space at the LAX NORTHSIDE Development. At such close proximity to LAX, there is no way to mitigate the pollution from the many vehicles at the airport, and particularly from the planes. There are no pollution controls on the planes, jet engines and propellers, so this exhaust/pollution will spill directly towards the exercise areas which are too close. Recent studies show that the pollution from the planes at LAX negatively affect surrounding neighborhoods for thousands of feet, and the LAX NORTHSIDE will be within hundreds of feet. No. 1

Furthermore, from the Westchester Business District parking lots I can smell the burning rubber from the tires of landing aircraft. This is a huge source of particulate matter pollution which will also spill onto LAX NORTHSIDE and the recreation/exercise areas.

Both of these, jet exhaust and tires burning and shredding on landing, are dangerous for those just living near the airport, but when a person is exercising their airways open and they breath deeper making them more susceptible to these harmful pollutants.

Instead of building exercise areas at LAX NORTHSIDE**,** which pose a health hazard, the money should instead be used to build new exercise areas somewhere else in Westchester, and other surrounding areas far enough away to not be subject to airport pollution. No. 2

Thank you.

Matthew Hetz
6211 W 78th St
Los Angeles, CA 90045
hetzm5@gmail.com

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Appendix B

LAX NORTHSIDE PLAN UPDATE

Additional Traffic Analysis

December 2014

Prepared for:

Los Angeles World Airports
One World Way
Los Angeles, California 90045

Prepared by:

Gibson Transportation Consulting, Inc.
523 W 6th Street, Suite 1234
Los Angeles, CA 90014

Table of Contents

TABLE LAXN-AS02-1
FUTURE WITHOUT PROJECT CONDITIONS (YEAR 2035)
FREEWAY SEGMENT PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	A.M. Peak Hour				P.M. Peak Hour			
				Volume	Speed	Density	LOS	Volume	Speed	Density	LOS
1.	I-405 South of I-10	NB SB	4.5 5.5	10,485 8,973	28.9 54.5	> 45 35.5	F E	8,696 10,155	47.6 51.2	> 45 42.8	F E
2.	I-405 South of Venice Boulevard	NB SB	5.5 5.5	10,504 9,298	49.6 54.0	> 45 37.2	F E	8,505 9,808	55.0 52.5	33.4 40.3	D E
3.	I-405 South of Culver Boulevard	NB SB	5.5 5.5	10,149 9,311	51.2 53.9	42.7 37.3	E E	8,765 9,622	54.8 53.1	34.5 39.1	D E
4.	I-405 South of Braddock Drive	NB SB	5.5 5.5	8,708 10,435	54.8 50.0	34.3 > 45	D F	8,833 9,899	54.7 52.2	34.8 40.9	D E
5.	I-405 South of SR-90	NB SB	4.5 4.5	8,839 11,804	46.6 7.7	> 45 > 45	F F	7,755 11,599	52.9 11.4	39.6 > 45	E F
6.	I-405 South of Centinela Avenue	NB SB	4.5 5.5	8,382 10,972	49.7 47.0	> 45 > 45	F F	10,818 10,248	24.0 50.8	> 45 43.6	F E
7.	I-405 South of Howard Hughes Parkway	NB SB	4.5 4.5	9,081 7,638	44.5 53.3	> 45 38.7	F E	8,300 8,579	50.2 48.4	44.6 > 45	E F
8.	I-405 South of La Tijera Boulevard	NB SB	4.5 4.5	8,529 9,710	48.8 38.3	> 45 > 45	F F	9,120 9,577	44.2 39.7	> 45 > 45	F F
9.	I-405 South of La Cienega Boulevard	NB SB	4.5 4.5	8,069 10,325	51.5 30.9	42.3 > 45	E F	9,080 9,769	44.5 37.7	> 45 > 45	F F
10.	I-405 South of Manchester Avenue	NB SB	4.5 4.5	8,491 9,005	49.0 45.2	> 45 > 45	F F	8,989 7,578	45.3 53.5	> 45 38.2	F E

TABLE LAXN-AS02-1
FUTURE WITHOUT PROJECT CONDITIONS (YEAR 2035)
FREEWAY SEGMENT PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	A.M. Peak Hour				P.M. Peak Hour			
				Volume	Speed	Density	LOS	Volume	Speed	Density	LOS
11.	I-405 South of Century Boulevard	NB SB	4.5 4.5	8,924 7,517	45.8 53.7	> 45 37.8	F E	10,592 6,492	27.3 55.0	> 45 31.9	F D
12.	I-405 South of Imperial Highway	NB SB	4.5 5.5	6,870 8,330	54.9 55.0	33.8 32.7	D D	6,407 7,593	55.0 55.0	31.5 29.8	D D
13.	I-405 South of I-105	NB SB	4.5 4.5	7,737 7,541	52.9 53.6	39.6 38.1	E E	8,111 7,054	51.1 54.7	43.0 34.9	E D
14.	I-405 South of El Segundo Boulevard	NB SB	4.5 4.5	7,592 7,365	53.4 54.1	38.5 36.9	E E	7,838 7,615	52.4 53.3	40.5 38.7	E E
15.	I-405 South of Rosecrans Avenue	NB SB	4.5 4.5	10,271 7,519	31.2 53.6	> 45 38.0	F E	8,956 8,994	45.3 45.0	> 45 > 45	F F
16.	I-105 West of Hughes Way	EB WB	3 2	3,389 6,363	55.0 49.0	22.2 > 45	C F	4,565 4,952	55.0 55.0	29.9 32.5	D D
17.	I-105 West of Douglas Avenue	EB WB	3 3	3,611 6,167	55.0 50.5	23.7 44.0	C E	4,245 4,279	55.0 55.0	27.8 28.1	D D
18.	I-105 West of Imperial Highway	EB WB	3 3	1,272 7,400	55.0 36.4	8.3 > 45	A F	1,459 6,335	55.0 49.2	9.6 > 45	A F
19.	I-105 West of I-405	EB WB	3 4	2,801 4,763	55.0 55.0	18.6 23.7	C C	3,918 3,407	55.0 55.0	26.0 16.9	C B
20.	I-105 West of Hawthorne Avenue	EB WB	3.5 3.5	6,197 5,849	49.8 52.2	> 45 40.8	F E	6,394 4,626	48.0 55.0	> 45 30.7	F D

TABLE LAXN-AS02-1
FUTURE WITHOUT PROJECT CONDITIONS (YEAR 2035)
FREEWAY SEGMENT PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	A.M. Peak Hour				P.M. Peak Hour			
				Volume	Speed	Density	LOS	Volume	Speed	Density	LOS
21.	I-105 West of Prairie Avenue	EB WB	3.5 3.5	6,556 7,833	46.3 27.4	> 45 > 45	F F	6,886 5,929	42.5 51.7	> 45 41.8	F E
22.	SR-90 West of Mindanao Way	EB WB	2 2	2,303 1,458	55.0 55.0	22.6 14.3	C B	2,223 1,442	55.0 55.0	21.9 14.2	C B
23.	SR-90 West of Culver Boulevard	EB WB	2 3	2,276 2,462	55.0 55.0	22.4 16.2	C B	2,234 2,474	55.0 55.0	22.0 16.3	C B
24.	SR-90 West of Centinela Avenue	EB WB	3 2	2,055 2,508	55.0 55.0	13.5 24.7	B C	2,537 2,528	55.0 55.0	16.7 24.9	B C
25.	SR-90 West of I-405	EB WB	3 4	4,108 3,284	55.0 55.0	27.0 16.2	D B	3,647 4,034	55.0 55.0	24.0 19.9	C C

Note: Freeway segment peak hour traffic volumes based on April 24, 2012 data from Caltrans' Performance Measurement System (PeMS).

TABLE LAXN-AS02-2A
FUTURE WITH PROJECT CONDITIONS (YEAR 2035)
FREEWAY SEGMENT A.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Existing (Year 2012)				Existing with Project (Year 2012)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
1.	I-405 South of I-10	NB SB	4.5 5.5	10,485 8,973	28.9 54.5	> 45 35.5	F E	56 147	28.1 54.3	> 45 36.2	F E
2.	I-405 South of Venice Boulevard	NB SB	5.5 5.5	10,504 9,298	49.6 54.0	> 45 37.2	F E	56 147	49.3 53.6	> 45 38.0	F E
3.	I-405 South of Culver Boulevard	NB SB	5.5 5.5	10,149 9,311	51.2 53.9	42.7 37.3	E E	43 163	51.1 53.5	43.1 38.2	E E
4.	I-405 South of Braddock Drive	NB SB	5.5 5.5	8,708 10,435	54.8 50.0	34.3 > 45	D F	44 163	54.8 49.1	34.5 > 45	D F
5.	I-405 South of SR-90	NB SB	4.5 4.5	8,839 11,804	46.6 7.7	> 45 > 45	F F	44 163	46.2 4.7	> 45 > 45	F F
6.	I-405 South of Centinela Avenue	NB SB	4.5 5.5	8,382 10,972	49.7 47.0	> 45 > 45	F F	27 99	49.5 46.4	> 45 > 45	F F
7.	I-405 South of Howard Hughes Parkway	NB SB	4.5 4.5	9,081 7,638	44.5 53.3	> 45 38.7	F E	8 30	44.4 53.2	> 45 38.9	F E
8.	I-405 South of La Tijera Boulevard	NB SB	4.5 4.5	8,529 9,710	48.8 38.3	> 45 > 45	F F	8 0	48.7 38.3	> 45 > 45	F F
9.	I-405 South of La Cienega Boulevard	NB SB	4.5 4.5	8,069 10,325	51.5 30.9	42.3 > 45	E F	0 0	51.5 30.9	42.3 > 45	E F
10.	I-405 South of Manchester Avenue	NB SB	4.5 4.5	8,491 9,005	49.0 45.2	> 45 > 45	F F	0 0	49.0 45.2	> 45 > 45	F F

TABLE LAXN-AS02-2A
FUTURE WITH PROJECT CONDITIONS (YEAR 2035)
FREEWAY SEGMENT A.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Existing (Year 2012)				Existing with Project (Year 2012)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
11.	I-405 South of Century Boulevard	NB SB	4.5 4.5	8,924 7,517	45.8 53.7	> 45 37.8	F E	0 4	45.8 53.7	> 45 37.8	F E
12.	I-405 South of Imperial Highway	NB SB	4.5 5.5	6,870 8,330	54.9 55.0	33.8 32.7	D D	0 4	54.9 55.0	33.8 32.7	D D
13.	I-405 South of I-105	NB SB	4.5 4.5	7,737 7,541	52.9 53.6	39.6 38.1	E E	0 28	52.9 53.5	39.6 38.3	E E
14.	I-405 South of El Segundo Boulevard	NB SB	4.5 4.5	7,592 7,365	53.4 54.1	38.5 36.9	E E	40 28	53.2 54.0	38.8 37.1	E E
15.	I-405 South of Rosecrans Avenue	NB SB	4.5 4.5	10,271 7,519	31.2 53.6	> 45 38.0	F E	103 28	29.8 53.5	> 45 38.2	F E
16.	I-105 West of Hughes Way	EB WB	3 2	3,389 6,363	55.0 49.0	22.2 > 45	C F	47 8	55.0 48.9	22.5 > 45	C F
17.	I-105 West of Douglas Avenue	EB WB	3 3	3,611 6,167	55.0 50.5	23.7 44.0	C E	47 176	55.0 49.1	24.0 > 45	C F
18.	I-105 West of Imperial Highway	EB WB	3 4	1,272 7,400	55.0 36.4	8.3 > 45	A F	30 176	55.0 33.5	8.5 > 45	A F
19.	I-105 West of I-405	EB WB	3 4	2,801 4,763	55.0 55.0	18.6 23.7	C C	30 176	55.0 55.0	18.8 24.6	C C
20.	I-105 West of Hawthorne Avenue	EB WB	3.5 3.5	6,197 5,849	49.8 52.2	> 45 40.8	F E	30 176	49.5 51.1	> 45 43.0	F E

TABLE LAXN-AS02-2A
FUTURE WITH PROJECT CONDITIONS (YEAR 2035)
FREEWAY SEGMENT A.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Existing (Year 2012)				Existing with Project (Year 2012)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
21.	I-105 West of Prairie Avenue	EB WB	3.5 3.5	6,556 7,833	46.3 27.4	> 45 > 45	F F	30 113	46.0 25.2	> 45 > 45	F F
22.	SR-90 West of Mindanao Way	EB WB	2 2	2,303 1,458	55.0 55.0	22.6 14.3	C B	0 0	55.0 55.0	22.6 14.3	C B
23.	SR-90 West of Culver Boulevard	EB WB	2 3	2,276 2,462	55.0 55.0	22.4 16.2	C B	0 0	55.0 55.0	22.4 16.2	C B
24.	SR-90 West of Centinela Avenue	EB WB	3 2	2,055 2,508	55.0 55.0	13.5 24.7	B C	28 15	55.0 55.0	13.7 24.9	B C
25.	SR-90 West of I-405	EB WB	3 4	4,108 3,284	55.0 55.0	27.0 16.2	D B	28 104	55.0 55.0	27.2 16.7	D B

TABLE LAXN-AS02-2B
FUTURE WITH PROJECT CONDITIONS (YEAR 2035)
FREEWAY SEGMENT P.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Existing (Year 2012)				Existing with Project (Year 2012)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
1.	I-405 South of I-10	NB SB	4.5 5.5	8,696 10,155	47.6 51.2	> 45 42.8	F E	173 70	46.3 50.9	> 45 43.3	F E
2.	I-405 South of Venice Boulevard	NB SB	5.5 5.5	8,505 9,808	55.0 52.5	33.4 40.3	D E	173 70	54.9 52.3	34.1 40.8	D E
3.	I-405 South of Culver Boulevard	NB SB	5.5 5.5	8,765 9,622	54.8 53.1	34.5 39.1	D E	184 78	54.6 52.9	35.4 39.6	E E
4.	I-405 South of Braddock Drive	NB SB	5.5 5.5	8,833 9,899	54.7 52.2	34.8 40.9	D E	184 78	54.5 51.9	35.7 41.5	E E
5.	I-405 South of SR-90	NB SB	4.5 4.5	7,755 11,599	52.9 11.4	39.6 > 45	E F	184 78	52.1 10.0	41.1 > 45	E F
6.	I-405 South of Centinela Avenue	NB SB	4.5 5.5	10,818 10,248	24.0 50.8	> 45 43.6	F E	112 48	22.3 50.6	> 45 44.0	F E
7.	I-405 South of Howard Hughes Parkway	NB SB	4.5 4.5	8,300 8,579	50.2 48.4	44.6 > 45	E F	33 14	50.0 48.3	45.0 > 45	E F
8.	I-405 South of La Tijera Boulevard	NB SB	4.5 4.5	9,120 9,577	44.2 39.7	> 45 > 45	F F	33 0	43.9 39.7	> 45 > 45	F F
9.	I-405 South of La Cienega Boulevard	NB SB	4.5 4.5	9,080 9,769	44.5 37.7	> 45 > 45	F F	0 0	44.5 37.7	> 45 > 45	F F
10.	I-405 South of Manchester Avenue	NB SB	4.5 4.5	8,989 7,578	45.3 53.5	> 45 38.2	F E	0 0	45.3 53.5	> 45 38.2	F E

TABLE LAXN-AS02-2B
FUTURE WITH PROJECT CONDITIONS (YEAR 2035)
FREEWAY SEGMENT P.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Existing (Year 2012)				Existing with Project (Year 2012)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
11.	I-405 South of Century Boulevard	NB SB	4.5 4.5	10,592 6,492	27.3 55.0	> 45 31.9	F D	0 18	27.3 55.0	> 45 32.0	F D
12.	I-405 South of Imperial Highway	NB SB	4.5 5.5	6,407 7,593	55.0 55.0	31.5 29.8	D D	0 18	55.0 55.0	31.5 29.9	D D
13.	I-405 South of I-105	NB SB	4.5 4.5	8,111 7,054	51.1 54.7	43.0 34.9	E D	0 82	51.1 54.6	43.0 35.4	E E
14.	I-405 South of El Segundo Boulevard	NB SB	4.5 4.5	7,838 7,615	52.4 53.3	40.5 38.7	E E	19 116	52.3 52.9	40.7 39.6	E E
15.	I-405 South of Rosecrans Avenue	NB SB	4.5 4.5	8,956 8,994	45.3 45.0	> 45 > 45	F F	49 116	44.9 44.0	> 45 > 45	F F
16.	I-105 West of Hughes Way	EB WB	3 2	4,565 4,952	55.0 55.0	29.9 32.5	D D	199 4	55.0 55.0	31.3 32.5	D D
17.	I-105 West of Douglas Avenue	EB WB	3 3	4,245 4,279	55.0 55.0	27.8 28.1	D D	199 84	55.0 55.0	29.1 28.6	D D
18.	I-105 West of Imperial Highway	EB WB	3 4	1,459 6,335	55.0 49.2	9.6 > 45	A F	127 84	55.0 48.4	10.4 > 45	A F
19.	I-105 West of I-405	EB WB	3 4	3,918 3,407	55.0 55.0	26.0 16.9	C B	127 84	55.0 55.0	26.8 17.4	D B
20.	I-105 West of Hawthorne Avenue	EB WB	3.5 3.5	6,394 4,626	48.0 55.0	> 45 30.7	F D	127 84	46.7 55.0	> 45 31.2	F D

TABLE LAXN-AS02-2B
FUTURE WITH PROJECT CONDITIONS (YEAR 2035)
FREEWAY SEGMENT P.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Existing (Year 2012)				Existing with Project (Year 2012)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
21.	I-105 West of Prairie Avenue	EB WB	3.5 3.5	6,886 5,929	42.5 51.7	> 45 41.8	F E	127 54	40.8 51.4	> 45 42.5	F E
22.	SR-90 West of Mindanao Way	EB WB	2 2	2,223 1,442	55.0 55.0	21.9 14.2	C B	0 0	55.0 55.0	21.9 14.2	C B
23.	SR-90 West of Culver Boulevard	EB WB	2 3	2,234 2,474	55.0 55.0	22.0 16.3	C B	0 0	55.0 55.0	22.0 16.3	C B
24.	SR-90 West of Centinela Avenue	EB WB	3 2	2,537 2,528	55.0 55.0	16.7 24.9	B C	118 7	55.0 55.0	17.5 25.0	B C
25.	SR-90 West of I-405	EB WB	3 4	3,647 4,034	55.0 55.0	24.0 19.9	C C	118 50	55.0 55.0	24.7 20.1	C C

TABLE LAXN-AS02-3A
FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2035)
FREEWAY SEGMENT A.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Existing (Year 2012)				Existing with Project with Mitigation (Year 2012)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
1.	I-405 South of I-10	NB SB	4.5 5.5	10,485 8,973	28.9 54.5	> 45 35.5	F E	54 140	28.1 54.3	> 45 36.2	F E
2.	I-405 South of Venice Boulevard	NB SB	5.5 5.5	10,504 9,298	49.6 54.0	> 45 37.2	F E	54 140	49.4 53.6	> 45 38.0	F E
3.	I-405 South of Culver Boulevard	NB SB	5.5 5.5	10,149 9,311	51.2 53.9	42.7 37.3	E E	42 156	51.1 53.5	43.1 38.2	E E
4.	I-405 South of Braddock Drive	NB SB	5.5 5.5	8,708 10,435	54.8 50.0	34.3 > 45	D F	42 156	54.8 49.2	34.4 > 45	D F
5.	I-405 South of SR-90	NB SB	4.5 4.5	8,839 11,804	46.6 7.7	> 45 > 45	F F	42 156	46.2 4.8	> 45 > 45	F F
6.	I-405 South of Centinela Avenue	NB SB	4.5 5.5	8,382 10,972	49.7 47.0	> 45 > 45	F F	26 94	49.5 46.4	> 45 > 45	F F
7.	I-405 South of Howard Hughes Parkway	NB SB	4.5 4.5	9,081 7,638	44.5 53.3	> 45 38.7	F E	7 28	44.4 53.2	> 45 38.9	F E
8.	I-405 South of La Tijera Boulevard	NB SB	4.5 4.5	8,529 9,710	48.8 38.3	> 45 > 45	F F	7 0	48.7 38.3	> 45 > 45	F F
9.	I-405 South of La Cienega Boulevard	NB SB	4.5 4.5	8,069 10,325	51.5 30.9	42.3 > 45	E F	0 0	51.5 30.9	42.3 > 45	E F
10.	I-405 South of Manchester Avenue	NB SB	4.5 4.5	8,491 9,005	49.0 45.2	> 45 > 45	F F	0 0	49.0 45.2	> 45 > 45	F F

TABLE LAXN-AS02-3A
FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2035)
FREEWAY SEGMENT A.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Existing (Year 2012)				Existing with Project with Mitigation (Year 2012)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
11.	I-405 South of Century Boulevard	NB SB	4.5 4.5	8,924 7,517	45.8 53.7	> 45 37.8	F E	0 4	45.8 53.7	> 45 37.8	F E
12.	I-405 South of Imperial Highway	NB SB	4.5 5.5	6,870 8,330	54.9 55.0	33.8 32.7	D D	0 4	54.9 55.0	33.8 32.7	D D
13.	I-405 South of I-105	NB SB	4.5 4.5	7,737 7,541	52.9 53.6	39.6 38.1	E E	0 27	52.9 53.5	39.6 38.3	E E
14.	I-405 South of El Segundo Boulevard	NB SB	4.5 4.5	7,592 7,365	53.4 54.1	38.5 36.9	E E	38 27	53.3 54.0	38.8 37.1	E E
15.	I-405 South of Rosecrans Avenue	NB SB	4.5 4.5	10,271 7,519	31.2 53.6	> 45 38.0	F E	98 27	29.9 53.5	> 45 38.2	F E
16.	I-105 West of Hughes Way	EB WB	3 2	3,389 6,363	55.0 49.0	22.2 > 45	C F	45 7	55.0 48.9	22.5 > 45	C F
17.	I-105 West of Douglas Avenue	EB WB	3 3	3,611 6,167	55.0 50.5	23.7 44.0	C E	45 168	55.0 49.2	24.0 > 45	C F
18.	I-105 West of Imperial Highway	EB WB	3 4	1,272 7,400	55.0 36.4	8.3 > 45	A F	29 168	55.0 33.6	8.5 > 45	A F
19.	I-105 West of I-405	EB WB	3 4	2,801 4,763	55.0 55.0	18.6 23.7	C C	29 168	55.0 55.0	18.8 24.5	C C
20.	I-105 West of Hawthorne Avenue	EB WB	3.5 3.5	6,197 5,849	49.8 52.2	> 45 40.8	F E	29 168	49.5 51.1	> 45 42.9	F E

TABLE LAXN-AS02-3A
FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2035)
FREEWAY SEGMENT A.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Existing (Year 2012)				Existing with Project with Mitigation (Year 2012)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
21.	I-105 West of Prairie Avenue	EB WB	3.5 3.5	6,556 7,833	46.3 27.4	> 45 > 45	F F	29 108	46.1 25.3	> 45 > 45	F F
22.	SR-90 West of Mindanao Way	EB WB	2 2	2,303 1,458	55.0 55.0	22.6 14.3	C B	0 0	55.0 55.0	22.6 14.3	C B
23.	SR-90 West of Culver Boulevard	EB WB	2 3	2,276 2,462	55.0 55.0	22.4 16.2	C B	0 0	55.0 55.0	22.4 16.2	C B
24.	SR-90 West of Centinela Avenue	EB WB	3 2	2,055 2,508	55.0 55.0	13.5 24.7	B C	27 14	55.0 55.0	13.7 24.9	B C
25.	SR-90 West of I-405	EB WB	3 4	4,108 3,284	55.0 55.0	27.0 16.2	D B	27 102	55.0 55.0	27.2 16.7	D B

TABLE LAXN-AS02-3B
FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2035)
FREEWAY SEGMENT P.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Existing (Year 2012)				Existing with Project with Mitigation (Year 2012)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
1.	I-405 South of I-10	NB SB	4.5 5.5	8,696 10,155	47.6 51.2	> 45 42.8	F E	166 68	46.4 50.9	> 45 43.3	F E
2.	I-405 South of Venice Boulevard	NB SB	5.5 5.5	8,505 9,808	55.0 52.5	33.4 40.3	D E	166 68	54.9 52.3	34.1 40.7	D E
3.	I-405 South of Culver Boulevard	NB SB	5.5 5.5	8,765 9,622	54.8 53.1	34.5 39.1	D E	176 75	54.6 52.9	35.3 39.6	E E
4.	I-405 South of Braddock Drive	NB SB	5.5 5.5	8,833 9,899	54.7 52.2	34.8 40.9	D E	177 75	54.5 51.9	35.7 41.4	E E
5.	I-405 South of SR-90	NB SB	4.5 4.5	7,755 11,599	52.9 11.4	39.6 > 45	E F	177 75	52.1 10.1	41.0 > 45	E F
6.	I-405 South of Centinela Avenue	NB SB	4.5 5.5	10,818 10,248	24.0 50.8	> 45 43.6	F E	107 46	22.3 50.6	> 45 44.0	F E
7.	I-405 South of Howard Hughes Parkway	NB SB	4.5 4.5	8,300 8,579	50.2 48.4	44.6 > 45	E F	32 13	50.0 48.3	45.0 > 45	E F
8.	I-405 South of La Tijera Boulevard	NB SB	4.5 4.5	9,120 9,577	44.2 39.7	> 45 > 45	F F	32 0	43.9 39.7	> 45 > 45	F F
9.	I-405 South of La Cienega Boulevard	NB SB	4.5 4.5	9,080 9,769	44.5 37.7	> 45 > 45	F F	0 0	44.5 37.7	> 45 > 45	F F
10.	I-405 South of Manchester Avenue	NB SB	4.5 4.5	8,989 7,578	45.3 53.5	> 45 38.2	F E	0 0	45.3 53.5	> 45 38.2	F E

TABLE LAXN-AS02-3B
FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2035)
FREEWAY SEGMENT P.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Existing (Year 2012)				Existing with Project with Mitigation (Year 2012)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
11.	I-405 South of Century Boulevard	NB SB	4.5 4.5	10,592 6,492	27.3 55.0	> 45 31.9	F D	0 17	27.3 55.0	> 45 31.9	F D
12.	I-405 South of Imperial Highway	NB SB	4.5 5.5	6,407 7,593	55.0 55.0	31.5 29.8	D D	0 17	55.0 55.0	31.5 29.9	D D
13.	I-405 South of I-105	NB SB	4.5 4.5	8,111 7,054	51.1 54.7	43.0 34.9	E D	0 79	51.1 54.6	43.0 35.4	E E
14.	I-405 South of El Segundo Boulevard	NB SB	4.5 4.5	7,838 7,615	52.4 53.3	40.5 38.7	E E	18 111	52.3 52.9	40.7 39.6	E E
15.	I-405 South of Rosecrans Avenue	NB SB	4.5 4.5	8,956 8,994	45.3 45.0	> 45 > 45	F F	47 111	45.0 44.0	> 45 > 45	F F
16.	I-105 West of Hughes Way	EB WB	3 2	4,565 4,952	55.0 55.0	29.9 32.5	D D	191 4	55.0 55.0	31.2 32.5	D D
17.	I-105 West of Douglas Avenue	EB WB	3 3	4,245 4,279	55.0 55.0	27.8 28.1	D D	191 81	55.0 55.0	29.1 28.6	D D
18.	I-105 West of Imperial Highway	EB WB	3 4	1,459 6,335	55.0 49.2	9.6 > 45	A F	122 81	55.0 48.5	10.4 > 45	A F
19.	I-105 West of I-405	EB WB	3 4	3,918 3,407	55.0 55.0	26.0 16.9	C B	122 81	55.0 55.0	26.8 17.3	D B
20.	I-105 West of Hawthorne Avenue	EB WB	3.5 3.5	6,394 4,626	48.0 55.0	> 45 30.7	F D	122 81	46.8 55.0	> 45 31.2	F D

TABLE LAXN-AS02-3B
FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2035)
FREEWAY SEGMENT P.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Existing (Year 2012)				Existing with Project with Mitigation (Year 2012)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
21.	I-105 West of Prairie Avenue	EB WB	3.5 3.5	6,886 5,929	42.5 51.7	> 45 41.8	F E	122 52	40.9 51.4	> 45 42.5	F E
22.	SR-90 West of Mindanao Way	EB WB	2 2	2,223 1,442	55.0 55.0	21.9 14.2	C B	0 0	55.0 55.0	21.9 14.2	C B
23.	SR-90 West of Culver Boulevard	EB WB	2 3	2,234 2,474	55.0 55.0	22.0 16.3	C B	0 0	55.0 55.0	22.0 16.3	C B
24.	SR-90 West of Centinela Avenue	EB WB	3 2	2,537 2,528	55.0 55.0	16.7 24.9	B C	116 7	55.0 55.0	17.4 25.0	B C
25.	SR-90 West of I-405	EB WB	3 4	3,647 4,034	55.0 55.0	24.0 19.9	C C	116 49	55.0 55.0	24.7 20.1	C C

TABLE LAXN-AS02-4
EXISTING CONDITIONS (YEAR 2012)
FREEWAY SEGMENT PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	A.M. Peak Hour				P.M. Peak Hour			
				Volume	Speed	Density	LOS	Volume	Speed	Density	LOS
1.	I-405 South of I-10	NB SB	4.5 5.5	8,524 7,295	48.2 55.0	> 45 28.9	F D	7,070 8,256	54.6 55.0	35.3 32.7	E D
2.	I-405 South of Venice Boulevard	NB SB	5.5 5.5	8,540 7,559	54.9 55.0	33.9 30.0	D D	6,915 7,974	55.0 55.0	27.4 31.6	D D
3.	I-405 South of Culver Boulevard	NB SB	5.5 5.5	8,251 7,570	55.0 55.0	32.7 30.0	D D	7,126 7,823	55.0 55.0	28.2 31.0	D D
4.	I-405 South of Braddock Drive	NB SB	5.5 5.5	7,080 8,484	55.0 54.9	28.1 33.7	D D	7,181 8,048	55.0 55.0	28.5 31.9	D D
5.	I-405 South of SR-90	NB SB	4.5 4.5	7,186 9,597	54.4 38.6	36.0 > 45	E F	6,305 9,430	55.0 40.4	31.2 > 45	D F
6.	I-405 South of Centinela Avenue	NB SB	4.5 5.5	6,815 8,920	54.9 54.5	33.8 35.7	D E	8,795 8,332	46.2 55.0	> 45 33.0	F D
7.	I-405 South of Howard Hughes Parkway	NB SB	4.5 4.5	7,383 6,210	53.9 55.0	37.3 30.8	E D	6,748 6,975	55.0 54.7	33.5 34.7	D D
8.	I-405 South of La Tijera Boulevard	NB SB	4.5 4.5	6,934 7,894	54.8 52.0	34.5 41.4	D E	7,415 7,786	53.8 52.4	37.6 40.5	E E
9.	I-405 South of La Cienega Boulevard	NB SB	4.5 4.5	6,560 8,394	55.0 49.1	32.5 > 45	D F	7,382 7,942	53.9 51.7	37.3 41.8	E E
10.	I-405 South of Manchester Avenue	NB SB	4.5 4.5	6,903 7,321	54.8 54.1	34.3 36.9	D E	7,308 6,161	54.1 55.0	36.8 30.5	E D

TABLE LAXN-AS02-4
EXISTING CONDITIONS (YEAR 2012)
FREEWAY SEGMENT PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	A.M. Peak Hour				P.M. Peak Hour			
				Volume	Speed	Density	LOS	Volume	Speed	Density	LOS
11.	I-405 South of Century Boulevard	NB SB	4.5 4.5	7,255 6,111	54.2 55.0	36.5 30.3	E D	8,611 5,278	47.6 55.0	> 45 26.1	F D
12.	I-405 South of Imperial Highway	NB SB	4.5 5.5	5,585 6,772	55.0 55.0	27.7 26.8	D D	5,209 6,173	55.0 55.0	25.8 24.5	C C
13.	I-405 South of I-105	NB SB	4.5 4.5	6,290 6,131	55.0 55.0	31.2 30.4	D D	6,594 5,735	55.0 55.0	32.7 28.4	D D
14.	I-405 South of El Segundo Boulevard	NB SB	4.5 4.5	6,172 5,988	55.0 55.0	30.6 29.7	D D	6,372 6,191	55.0 55.0	31.6 30.7	D D
15.	I-405 South of Rosecrans Avenue	NB SB	4.5 4.5	8,350 6,113	49.4 55.0	> 45 30.3	F D	7,281 7,312	54.2 54.1	36.6 36.9	E E
16.	I-105 West of Hughes Way	EB WB	3 2	2,755 5,173	55.0 54.8	18.2 34.3	C D	3,711 4,026	55.0 55.0	24.5 26.6	C D
17.	I-105 West of Douglas Avenue	EB WB	3 3	2,936 5,014	55.0 55.0	19.4 33.1	C D	3,451 3,479	55.0 55.0	22.8 23.0	C C
18.	I-105 West of Imperial Highway	EB WB	3 3	1,034 6,016	55.0 51.3	6.8 42.6	A E	1,186 5,150	55.0 54.9	7.8 34.1	A D
19.	I-105 West of I-405	EB WB	3 4	2,277 3,872	55.0 55.0	15.0 19.2	B C	3,185 2,770	55.0 55.0	21.0 13.7	C B
20.	I-105 West of Hawthorne Avenue	EB WB	3.5 3.5	5,038 4,755	55.0 55.0	33.3 31.4	D D	5,198 3,761	54.8 55.0	34.5 24.8	D C

TABLE LAXN-AS02-4
EXISTING CONDITIONS (YEAR 2012)
FREEWAY SEGMENT PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	A.M. Peak Hour				P.M. Peak Hour			
				Volume	Speed	Density	LOS	Volume	Speed	Density	LOS
21.	I-105 West of Prairie Avenue	EB WB	3.5 3.5	5,330 6,368	54.5 48.5	35.5 > 45	E F	5,598 4,820	53.6 55.0	37.9 31.8	E D
22.	SR-90 West of Mindanao Way	EB WB	2 2	1,872 1,185	55.0 55.0	18.5 11.7	C B	1,807 1,172	55.0 55.0	17.9 11.6	B B
23.	SR-90 West of Culver Boulevard	EB WB	2 3	1,850 2,002	55.0 55.0	18.3 13.2	C B	1,816 2,011	55.0 55.0	18.0 13.3	B B
24.	SR-90 West of Centinela Avenue	EB WB	3 2	1,671 2,039	55.0 55.0	11.0 20.2	A C	2,063 2,055	55.0 55.0	13.6 20.4	B C
25.	SR-90 West of I-405	EB WB	3 4	3,340 2,670	55.0 55.0	22.1 13.2	C B	2,965 3,280	55.0 55.0	19.6 16.3	C B

Note: Freeway segment peak hour traffic volumes based on April 24, 2012 data from Caltrans' Performance Measurement System (PeMS).

TABLE LAXN-AS02-5A
EXISTING WITH PROJECT CONDITIONS (YEAR 2012)
FREEWAY SEGMENT A.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Existing (Year 2012)				Existing with Project (Year 2012)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
1.	I-405 South of I-10	NB SB	4.5 5.5	8,524 7,295	48.2 55.0	> 45 28.9	F D	56 147	48.5 55.0	> 45 29.2	F D
2.	I-405 South of Venice Boulevard	NB SB	5.5 5.5	8,540 7,559	54.9 55.0	33.9 30.0	D D	56 147	54.9 55.0	33.8 30.2	D D
3.	I-405 South of Culver Boulevard	NB SB	5.5 5.5	8,251 7,570	55.0 55.0	32.7 30.0	D D	43 163	55.0 55.0	32.5 30.3	D D
4.	I-405 South of Braddock Drive	NB SB	5.5 5.5	7,080 8,484	55.0 54.9	28.1 33.7	D D	44 163	55.0 54.9	27.9 34.0	D D
5.	I-405 South of SR-90	NB SB	4.5 4.5	7,186 9,597	54.4 38.6	36.0 > 45	E F	44 163	54.4 37.9	35.8 > 45	E F
6.	I-405 South of Centinela Avenue	NB SB	4.5 5.5	6,815 8,920	54.9 54.5	33.8 35.7	D E	27 99	54.9 54.5	33.6 35.8	D E
7.	I-405 South of Howard Hughes Parkway	NB SB	4.5 4.5	7,383 6,210	53.9 55.0	37.3 30.8	E D	8 30	54.1 55.0	36.9 30.6	E D
8.	I-405 South of La Tijera Boulevard	NB SB	4.5 4.5	6,934 7,894	54.8 52.0	34.5 41.4	D E	8 0	54.9 52.3	34.2 40.7	D E
9.	I-405 South of La Cienega Boulevard	NB SB	4.5 4.5	6,560 8,394	55.0 49.1	32.5 > 45	D F	0 0	55.0 49.6	32.2 > 45	D F
10.	I-405 South of Manchester Avenue	NB SB	4.5 4.5	6,903 7,321	54.8 54.1	34.3 36.9	D E	0 0	54.9 54.2	34.0 36.5	D E

TABLE LAXN-AS02-5A
EXISTING WITH PROJECT CONDITIONS (YEAR 2012)
FREEWAY SEGMENT A.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Existing (Year 2012)				Existing with Project (Year 2012)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
11.	I-405 South of Century Boulevard	NB SB	4.5 4.5	7,255 6,111	54.2 55.0	36.5 30.3	E D	0 4	54.4 55.0	36.0 30.0	E D
12.	I-405 South of Imperial Highway	NB SB	4.5 5.5	5,585 6,772	55.0 55.0	27.7 26.8	D D	0 4	55.0 55.0	27.4 26.6	D D
13.	I-405 South of I-105	NB SB	4.5 4.5	6,290 6,131	55.0 55.0	31.2 30.4	D D	0 28	55.0 55.0	31.0 30.3	D D
14.	I-405 South of El Segundo Boulevard	NB SB	4.5 4.5	6,172 5,988	55.0 55.0	30.6 29.7	D D	40 28	55.0 55.0	30.6 29.6	D D
15.	I-405 South of Rosecrans Avenue	NB SB	4.5 4.5	8,350 6,113	49.4 55.0	> 45 30.3	F D	103 28	49.1 55.0	> 45 30.2	F D
16.	I-105 West of Hughes Way	EB WB	3 2	2,755 5,173	55.0 54.8	18.2 34.3	C D	47 8	55.0 54.9	18.4 34.1	C D
17.	I-105 West of Douglas Avenue	EB WB	3 3	2,936 5,014	55.0 55.0	19.4 33.1	C D	47 176	55.0 54.9	19.6 34.1	C D
18.	I-105 West of Imperial Highway	EB WB	3 4	1,034 6,016	55.0 51.3	6.8 42.6	A E	30 176	55.0 50.3	7.0 44.4	A E
19.	I-105 West of I-405	EB WB	3 4	2,277 3,872	55.0 55.0	15.0 19.2	B C	30 176	55.0 55.0	15.3 20.1	B C
20.	I-105 West of Hawthorne Avenue	EB WB	3.5 3.5	5,038 4,755	55.0 55.0	33.3 31.4	D D	30 176	54.9 55.0	33.7 32.7	D D

TABLE LAXN-AS02-5A
EXISTING WITH PROJECT CONDITIONS (YEAR 2012)
FREEWAY SEGMENT A.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Existing (Year 2012)				Existing with Project (Year 2012)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
21.	I-105 West of Prairie Avenue	EB WB	3.5 3.5	5,330 6,368	54.5 48.5	35.5 > 45	E F	30 113	54.4 47.1	35.9 > 45	E F
22.	SR-90 West of Mindanao Way	EB WB	2 2	1,872 1,185	55.0 55.0	18.5 11.7	C B	0 0	55.0 55.0	18.4 11.7	C B
23.	SR-90 West of Culver Boulevard	EB WB	2 3	1,850 2,002	55.0 55.0	18.3 13.2	C B	0 0	55.0 55.0	18.2 13.2	C B
24.	SR-90 West of Centinela Avenue	EB WB	3 2	1,671 2,039	55.0 55.0	11.0 20.2	A C	28 15	55.0 55.0	11.2 20.3	B C
25.	SR-90 West of I-405	EB WB	3 4	3,340 2,670	55.0 55.0	22.1 13.2	C B	28 104	55.0 55.0	22.1 13.7	C B

TABLE LAXN-AS02-5B
EXISTING WITH PROJECT CONDITIONS (YEAR 2012)
FREEWAY SEGMENT P.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Existing (Year 2012)				Existing with Project (Year 2012)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
1.	I-405 South of I-10	NB SB	4.5 5.5	7,070 8,256	54.6 55.0	35.3 32.7	E D	173 70	54.4 55.0	35.9 32.7	E D
2.	I-405 South of Venice Boulevard	NB SB	5.5 5.5	6,915 7,974	55.0 55.0	27.4 31.6	D D	173 70	55.0 55.0	27.8 31.6	D D
3.	I-405 South of Culver Boulevard	NB SB	5.5 5.5	7,126 7,823	55.0 55.0	28.2 31.0	D D	184 78	55.0 55.0	28.7 31.0	D D
4.	I-405 South of Braddock Drive	NB SB	5.5 5.5	7,181 8,048	55.0 55.0	28.5 31.9	D D	184 78	55.0 55.0	28.9 31.9	D D
5.	I-405 South of SR-90	NB SB	4.5 4.5	6,305 9,430	55.0 40.4	31.2 > 45	D F	184 78	55.0 40.6	31.8 > 45	D F
6.	I-405 South of Centinela Avenue	NB SB	4.5 5.5	8,795 8,332	46.2 55.0	> 45 33.0	F D	112 48	46.0 55.0	> 45 32.9	F D
7.	I-405 South of Howard Hughes Parkway	NB SB	4.5 4.5	6,748 6,975	55.0 54.7	33.5 34.7	D D	33 14	55.0 54.8	33.3 34.4	D D
8.	I-405 South of La Tijera Boulevard	NB SB	4.5 4.5	7,415 7,786	53.8 52.4	37.6 40.5	E E	33 0	53.9 52.7	37.3 39.8	E E
9.	I-405 South of La Cienega Boulevard	NB SB	4.5 4.5	7,382 7,942	53.9 51.7	37.3 41.8	E E	0 0	54.1 52.1	36.9 41.2	E E
10.	I-405 South of Manchester Avenue	NB SB	4.5 4.5	7,308 6,161	54.1 55.0	36.8 30.5	E D	0 0	54.3 55.0	36.4 30.3	E D

TABLE LAXN-AS02-5B
EXISTING WITH PROJECT CONDITIONS (YEAR 2012)
FREEWAY SEGMENT P.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Existing (Year 2012)				Existing with Project (Year 2012)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
11.	I-405 South of Century Boulevard	NB SB	4.5 4.5	8,611 5,278	47.6 55.0	> 45 26.1	F D	0 18	48.2 55.0	> 45 26.0	F C
12.	I-405 South of Imperial Highway	NB SB	4.5 5.5	5,209 6,173	55.0 55.0	25.8 24.5	C C	0 18	55.0 55.0	25.6 24.3	C C
13.	I-405 South of I-105	NB SB	4.5 4.5	6,594 5,735	55.0 55.0	32.7 28.4	D D	0 82	55.0 55.0	32.5 28.6	D D
14.	I-405 South of El Segundo Boulevard	NB SB	4.5 4.5	6,372 6,191	55.0 55.0	31.6 30.7	D D	19 116	55.0 55.0	31.5 31.1	D D
15.	I-405 South of Rosecrans Avenue	NB SB	4.5 4.5	7,281 7,312	54.2 54.1	36.6 36.9	E E	49 116	54.2 53.9	36.7 37.3	E E
16.	I-105 West of Hughes Way	EB WB	3 2	3,711 4,026	55.0 55.0	24.5 26.6	C D	199 4	55.0 55.0	25.7 26.4	C D
17.	I-105 West of Douglas Avenue	EB WB	3 3	3,451 3,479	55.0 55.0	22.8 23.0	C C	199 84	55.0 55.0	23.9 23.4	C C
18.	I-105 West of Imperial Highway	EB WB	3 4	1,186 5,150	55.0 54.9	7.8 34.1	A D	127 84	55.0 54.8	8.6 34.4	A D
19.	I-105 West of I-405	EB WB	3 4	3,185 2,770	55.0 55.0	21.0 13.7	C B	127 84	55.0 55.0	22.0 14.2	C B
20.	I-105 West of Hawthorne Avenue	EB WB	3.5 3.5	5,198 3,761	54.8 55.0	34.5 24.8	D C	127 84	54.5 55.0	35.7 25.5	E C

TABLE LAXN-AS02-5B
EXISTING WITH PROJECT CONDITIONS (YEAR 2012)
FREEWAY SEGMENT P.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Existing (Year 2012)				Existing with Project (Year 2012)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
21.	I-105 West of Prairie Avenue	EB WB	3.5 3.5	5,598 4,820	53.6 55.0	37.9 31.8	E D	127 54	52.9 55.0	39.5 32.3	E D
22.	SR-90 West of Mindanao Way	EB WB	2 2	1,807 1,172	55.0 55.0	17.9 11.6	B B	0 0	55.0 55.0	17.8 11.5	B B
23.	SR-90 West of Culver Boulevard	EB WB	2 3	1,816 2,011	55.0 55.0	18.0 13.3	B B	0 0	55.0 55.0	17.9 13.2	B B
24.	SR-90 West of Centinela Avenue	EB WB	3 2	2,063 2,055	55.0 55.0	13.6 20.4	B C	118 7	55.0 55.0	14.3 20.3	B C
25.	SR-90 West of I-405	EB WB	3 4	2,965 3,280	55.0 55.0	19.6 16.3	C B	118 50	55.0 55.0	20.3 16.4	C B

TABLE LAXN-AS02-6A
EXISTING WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2012)
FREEWAY SEGMENT A.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Existing (Year 2012)				Existing with Project with Mitigation (Year 2012)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
1.	I-405 South of I-10	NB SB	4.5 5.5	8,524 7,295	48.2 55.0	> 45 28.9	F D	54 140	48.5 55.0	> 45 29.2	F D
2.	I-405 South of Venice Boulevard	NB SB	5.5 5.5	8,540 7,559	54.9 55.0	33.9 30.0	D D	54 140	54.9 55.0	33.8 30.2	D D
3.	I-405 South of Culver Boulevard	NB SB	5.5 5.5	8,251 7,570	55.0 55.0	32.7 30.0	D D	42 156	55.0 55.0	32.5 30.3	D D
4.	I-405 South of Braddock Drive	NB SB	5.5 5.5	7,080 8,484	55.0 54.9	28.1 33.7	D D	42 156	55.0 54.9	27.9 34.0	D D
5.	I-405 South of SR-90	NB SB	4.5 4.5	7,186 9,597	54.4 38.6	36.0 > 45	E F	42 156	54.4 38.0	35.8 > 45	E F
6.	I-405 South of Centinela Avenue	NB SB	4.5 5.5	6,815 8,920	54.9 54.5	33.8 35.7	D E	26 94	54.9 54.5	33.6 35.7	D E
7.	I-405 South of Howard Hughes Parkway	NB SB	4.5 4.5	7,383 6,210	53.9 55.0	37.3 30.8	E D	7 28	54.1 55.0	36.9 30.6	E D
8.	I-405 South of La Tijera Boulevard	NB SB	4.5 4.5	6,934 7,894	54.8 52.0	34.5 41.4	D E	7 0	54.9 52.3	34.2 40.7	D E
9.	I-405 South of La Cienega Boulevard	NB SB	4.5 4.5	6,560 8,394	55.0 49.1	32.5 > 45	D F	0 0	55.0 49.6	32.2 > 45	D F
10.	I-405 South of Manchester Avenue	NB SB	4.5 4.5	6,903 7,321	54.8 54.1	34.3 36.9	D E	0 0	54.9 54.2	34.0 36.5	D E

TABLE LAXN-AS02-6A
EXISTING WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2012)
FREEWAY SEGMENT A.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Existing (Year 2012)				Existing with Project with Mitigation (Year 2012)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
11.	I-405 South of Century Boulevard	NB SB	4.5 4.5	7,255 6,111	54.2 55.0	36.5 30.3	E D	0 4	54.4 55.0	36.0 30.0	E D
12.	I-405 South of Imperial Highway	NB SB	4.5 5.5	5,585 6,772	55.0 55.0	27.7 26.8	D D	0 4	55.0 55.0	27.4 26.6	D D
13.	I-405 South of I-105	NB SB	4.5 4.5	6,290 6,131	55.0 55.0	31.2 30.4	D D	0 27	55.0 55.0	31.0 30.3	D D
14.	I-405 South of El Segundo Boulevard	NB SB	4.5 4.5	6,172 5,988	55.0 55.0	30.6 29.7	D D	38 27	55.0 55.0	30.6 29.6	D D
15.	I-405 South of Rosecrans Avenue	NB SB	4.5 4.5	8,350 6,113	49.4 55.0	> 45 30.3	F D	98 27	49.1 55.0	> 45 30.2	F D
16.	I-105 West of Hughes Way	EB WB	3 2	2,755 5,173	55.0 54.8	18.2 34.3	C D	45 7	55.0 54.9	18.4 34.1	C D
17.	I-105 West of Douglas Avenue	EB WB	3 3	2,936 5,014	55.0 55.0	19.4 33.1	C D	45 168	55.0 54.9	19.5 34.1	C D
18.	I-105 West of Imperial Highway	EB WB	3 4	1,034 6,016	55.0 51.3	6.8 42.6	A E	29 168	55.0 50.4	7.0 44.3	A E
19.	I-105 West of I-405	EB WB	3 4	2,277 3,872	55.0 55.0	15.0 19.2	B C	29 168	55.0 55.0	15.3 20.1	B C
20.	I-105 West of Hawthorne Avenue	EB WB	3.5 3.5	5,038 4,755	55.0 55.0	33.3 31.4	D D	29 168	54.9 55.0	33.7 32.7	D D

TABLE LAXN-AS02-6A
EXISTING WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2012)
FREEWAY SEGMENT A.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Existing (Year 2012)				Existing with Project with Mitigation (Year 2012)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
21.	I-105 West of Prairie Avenue	EB WB	3.5 3.5	5,330 6,368	54.5 48.5	35.5 > 45	E F	29 108	54.4 47.2	35.9 > 45	E F
22.	SR-90 West of Mindanao Way	EB WB	2 2	1,872 1,185	55.0 55.0	18.5 11.7	C B	0 0	55.0 55.0	18.4 11.7	C B
23.	SR-90 West of Culver Boulevard	EB WB	2 3	1,850 2,002	55.0 55.0	18.3 13.2	C B	0 0	55.0 55.0	18.2 13.2	C B
24.	SR-90 West of Centinela Avenue	EB WB	3 2	1,671 2,039	55.0 55.0	11.0 20.2	A C	27 14	55.0 55.0	11.2 20.2	B C
25.	SR-90 West of I-405	EB WB	3 4	3,340 2,670	55.0 55.0	22.1 13.2	C B	27 102	55.0 55.0	22.1 13.7	C B

TABLE LAXN-AS02-6B
EXISTING WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2012)
FREEWAY SEGMENT P.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Existing (Year 2012)				Existing with Project with Mitigation (Year 2012)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
1.	I-405 South of I-10	NB SB	4.5 5.5	7,070 8,256	54.6 55.0	35.3 32.7	E D	166 68	54.4 55.0	35.9 32.7	E D
2.	I-405 South of Venice Boulevard	NB SB	5.5 5.5	6,915 7,974	55.0 55.0	27.4 31.6	D D	166 68	55.0 55.0	27.8 31.5	D D
3.	I-405 South of Culver Boulevard	NB SB	5.5 5.5	7,126 7,823	55.0 55.0	28.2 31.0	D D	176 75	55.0 55.0	28.7 31.0	D D
4.	I-405 South of Braddock Drive	NB SB	5.5 5.5	7,181 8,048	55.0 55.0	28.5 31.9	D D	177 75	55.0 55.0	28.9 31.9	D D
5.	I-405 South of SR-90	NB SB	4.5 4.5	6,305 9,430	55.0 40.4	31.2 > 45	D F	177 75	55.0 40.6	31.8 > 45	D F
6.	I-405 South of Centinela Avenue	NB SB	4.5 5.5	8,795 8,332	46.2 55.0	> 45 33.0	F D	107 46	46.0 55.0	> 45 32.9	F D
7.	I-405 South of Howard Hughes Parkway	NB SB	4.5 4.5	6,748 6,975	55.0 54.7	33.5 34.7	D D	32 13	55.0 54.8	33.3 34.4	D D
8.	I-405 South of La Tijera Boulevard	NB SB	4.5 4.5	7,415 7,786	53.8 52.4	37.6 40.5	E E	32 0	53.9 52.7	37.3 39.8	E E
9.	I-405 South of La Cienega Boulevard	NB SB	4.5 4.5	7,382 7,942	53.9 51.7	37.3 41.8	E E	0 0	54.1 52.1	36.9 41.2	E E
10.	I-405 South of Manchester Avenue	NB SB	4.5 4.5	7,308 6,161	54.1 55.0	36.8 30.5	E D	0 0	54.3 55.0	36.4 30.3	E D

TABLE LAXN-AS02-6B
EXISTING WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2012)
FREEWAY SEGMENT P.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Existing (Year 2012)				Existing with Project with Mitigation (Year 2012)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
11.	I-405 South of Century Boulevard	NB SB	4.5 4.5	8,611 5,278	47.6 55.0	> 45 26.1	F D	0 17	48.2 55.0	> 45 26.0	F C
12.	I-405 South of Imperial Highway	NB SB	4.5 5.5	5,209 6,173	55.0 55.0	25.8 24.5	C C	0 17	55.0 55.0	25.6 24.3	C C
13.	I-405 South of I-105	NB SB	4.5 4.5	6,594 5,735	55.0 55.0	32.7 28.4	D D	0 79	55.0 55.0	32.5 28.6	D D
14.	I-405 South of El Segundo Boulevard	NB SB	4.5 4.5	6,372 6,191	55.0 55.0	31.6 30.7	D D	18 111	55.0 55.0	31.5 31.0	D D
15.	I-405 South of Rosecrans Avenue	NB SB	4.5 4.5	7,281 7,312	54.2 54.1	36.6 36.9	E E	47 111	54.2 53.9	36.7 37.3	E E
16.	I-105 West of Hughes Way	EB WB	3 2	3,711 4,026	55.0 55.0	24.5 26.6	C D	191 4	55.0 55.0	25.6 26.4	C D
17.	I-105 West of Douglas Avenue	EB WB	3 3	3,451 3,479	55.0 55.0	22.8 23.0	C C	191 81	55.0 55.0	23.9 23.3	C C
18.	I-105 West of Imperial Highway	EB WB	3 4	1,186 5,150	55.0 54.9	7.8 34.1	A D	122 81	55.0 54.8	8.6 34.4	A D
19.	I-105 West of I-405	EB WB	3 4	3,185 2,770	55.0 55.0	21.0 13.7	C B	122 81	55.0 55.0	21.9 14.2	C B
20.	I-105 West of Hawthorne Avenue	EB WB	3.5 3.5	5,198 3,761	54.8 55.0	34.5 24.8	D C	122 81	54.5 55.0	35.6 25.5	E C

TABLE LAXN-AS02-6B
EXISTING WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2012)
FREEWAY SEGMENT P.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Existing (Year 2012)				Existing with Project with Mitigation (Year 2012)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
21.	I-105 West of Prairie Avenue	EB WB	3.5 3.5	5,598 4,820	53.6 55.0	37.9 31.8	E D	122 52	53.0 55.0	39.4 32.3	E D
22.	SR-90 West of Mindanao Way	EB WB	2 2	1,807 1,172	55.0 55.0	17.9 11.6	B B	0 0	55.0 55.0	17.8 11.5	B B
23.	SR-90 West of Culver Boulevard	EB WB	2 3	1,816 2,011	55.0 55.0	18.0 13.3	B B	0 0	55.0 55.0	17.9 13.2	B B
24.	SR-90 West of Centinela Avenue	EB WB	3 2	2,063 2,055	55.0 55.0	13.6 20.4	B C	116 7	55.0 55.0	14.3 20.3	B C
25.	SR-90 West of I-405	EB WB	3 4	2,965 3,280	55.0 55.0	19.6 16.3	C B	116 49	55.0 55.0	20.3 16.4	C B

TABLE LAXN-AS02-7
FUTURE WITHOUT PROJECT CONDITIONS (YEAR 2022)
FREEWAY SEGMENT PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	A.M. Peak Hour				P.M. Peak Hour			
				Volume	Speed	Density	LOS	Volume	Speed	Density	LOS
1.	I-405 South of I-10	NB SB	4.5 5.5	9,317 7,973	42.4 55.0	> 45 31.3	F D	7,728 9,024	53.0 54.5	39.3 35.7	E E
2.	I-405 South of Venice Boulevard	NB SB	5.5 5.5	9,334 8,262	53.9 55.0	37.4 32.4	E D	7,558 8,716	55.0 54.8	29.7 34.3	D D
3.	I-405 South of Culver Boulevard	NB SB	5.5 5.5	9,018 8,274	54.5 55.0	35.7 32.5	E D	7,789 8,551	55.0 55.0	30.6 33.6	D D
4.	I-405 South of Braddock Drive	NB SB	5.5 5.5	7,738 9,273	55.0 54.0	30.4 37.1	D E	7,849 8,796	55.0 54.8	30.8 34.7	D D
5.	I-405 South of SR-90	NB SB	4.5 4.5	7,854 10,490	52.5 28.8	40.3 > 45	E F	6,891 10,307	54.9 31.3	33.9 > 45	D F
6.	I-405 South of Centinela Avenue	NB SB	4.5 5.5	7,449 9,750	53.9 52.7	37.3 40.0	E E	9,613 9,107	39.4 54.3	> 45 36.2	F E
7.	I-405 South of Howard Hughes Parkway	NB SB	4.5 4.5	8,070 6,788	51.5 55.0	42.3 33.3	E D	7,376 7,624	54.1 53.3	36.8 38.6	E E
8.	I-405 South of La Tijera Boulevard	NB SB	4.5 4.5	7,579 8,628	53.5 48.1	38.2 > 45	E F	8,105 8,510	51.3 48.9	42.7 > 45	E F
9.	I-405 South of La Cienega Boulevard	NB SB	4.5 4.5	7,170 9,175	54.5 43.7	35.5 > 45	E F	8,069 8,681	51.5 47.7	42.3 > 45	E F
10.	I-405 South of Manchester Avenue	NB SB	4.5 4.5	7,545 8,002	53.6 51.8	38.0 41.7	E E	7,988 6,734	51.9 55.0	41.6 33.1	E D

TABLE LAXN-AS02-7
FUTURE WITHOUT PROJECT CONDITIONS (YEAR 2022)
FREEWAY SEGMENT PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	A.M. Peak Hour				P.M. Peak Hour			
				Volume	Speed	Density	LOS	Volume	Speed	Density	LOS
11.	I-405 South of Century Boulevard	NB SB	4.5 4.5	7,930 6,679	52.1 55.0	41.1 32.8	E D	9,412 5,769	41.4 55.0	> 45 28.3	F D
12.	I-405 South of Imperial Highway	NB SB	4.5 5.5	6,104 7,402	55.0 55.0	30.0 29.1	D D	5,693 6,747	55.0 55.0	27.9 26.5	D D
13.	I-405 South of I-105	NB SB	4.5 4.5	6,875 6,701	54.9 55.0	33.9 33.0	D D	7,207 6,268	54.4 55.0	35.9 30.9	E D
14.	I-405 South of El Segundo Boulevard	NB SB	4.5 4.5	6,746 6,545	55.0 55.0	33.2 32.2	D D	6,965 6,767	54.8 55.0	34.4 33.3	D D
15.	I-405 South of Rosecrans Avenue	NB SB	4.5 4.5	9,127 6,682	43.9 55.0	> 45 32.9	F D	7,958 7,992	51.9 51.7	41.5 41.8	E E
16.	I-105 West of Hughes Way	EB WB	3 2	3,011 5,654	55.0 53.6	19.7 38.1	C E	4,056 4,400	55.0 55.0	26.6 28.9	D D
17.	I-105 West of Douglas Avenue	EB WB	3 3	3,209 5,480	55.0 54.2	21.1 36.5	C E	3,772 3,803	55.0 55.0	24.7 24.9	C C
18.	I-105 West of Imperial Highway	EB WB	3 3	1,130 6,575	55.0 46.9	7.4 > 45	A F	1,296 5,629	55.0 53.7	8.5 37.8	A E
19.	I-105 West of I-405	EB WB	3 4	2,489 4,232	55.0 55.0	16.5 21.1	B C	3,481 3,028	55.0 55.0	23.1 15.1	C B
20.	I-105 West of Hawthorne Avenue	EB WB	3.5 3.5	5,507 5,197	53.9 54.8	37.3 34.6	E D	5,681 4,111	53.2 55.0	39.0 27.3	E D

TABLE LAXN-AS02-7
FUTURE WITHOUT PROJECT CONDITIONS (YEAR 2022)
FREEWAY SEGMENT PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	A.M. Peak Hour				P.M. Peak Hour			
				Volume	Speed	Density	LOS	Volume	Speed	Density	LOS
21.	I-105 West of Prairie Avenue	EB WB	3.5 3.5	5,826 6,960	52.4 41.5	40.6 > 45	E F	6,119 5,268	50.4 54.6	44.3 35.2	E E
22.	SR-90 West of Mindanao Way	EB WB	2 2	2,046 1,295	55.0 55.0	20.1 12.7	C B	1,975 1,281	55.0 55.0	19.4 12.6	C B
23.	SR-90 West of Culver Boulevard	EB WB	2 3	2,022 2,188	55.0 55.0	19.9 14.4	C B	1,985 2,198	55.0 55.0	19.6 14.5	C B
24.	SR-90 West of Centinela Avenue	EB WB	3 2	1,826 2,229	55.0 55.0	12.0 22.0	B C	2,255 2,246	55.0 55.0	14.8 22.1	B C
25.	SR-90 West of I-405	EB WB	3 4	3,651 2,918	55.0 55.0	24.0 14.4	C B	3,241 3,585	55.0 55.0	21.3 17.7	C B

TABLE LAXN-AS02-8A
FUTURE WITH PROJECT CONDITIONS (YEAR 2022)
FREEWAY SEGMENT A.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Future without Project (Year 2022)				Future with Project (Year 2022)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
1.	I-405 South of I-10	NB SB	4.5 5.5	9,317 7,973	42.4 55.0	> 45 31.3	F D	56 147	41.9 55.0	> 45 31.9	F D
2.	I-405 South of Venice Boulevard	NB SB	5.5 5.5	9,334 8,262	53.9 55.0	37.4 32.4	E D	56 147	53.7 55.0	37.7 33.0	E D
3.	I-405 South of Culver Boulevard	NB SB	5.5 5.5	9,018 8,274	54.5 55.0	35.7 32.5	E D	43 163	54.4 55.0	35.9 33.1	E D
4.	I-405 South of Braddock Drive	NB SB	5.5 5.5	7,738 9,273	55.0 54.0	30.4 37.1	D E	44 163	55.0 53.6	30.5 38.0	D E
5.	I-405 South of SR-90	NB SB	4.5 4.5	7,854 10,490	52.5 28.8	40.3 > 45	E F	44 163	52.3 26.6	40.7 > 45	E F
6.	I-405 South of Centinela Avenue	NB SB	4.5 5.5	7,449 9,750	53.9 52.7	37.3 40.0	E E	27 99	53.8 52.4	37.5 40.6	E E
7.	I-405 South of Howard Hughes Parkway	NB SB	4.5 4.5	8,070 6,788	51.5 55.0	42.3 33.3	E D	8 30	51.4 55.0	42.4 33.5	E D
8.	I-405 South of La Tijera Boulevard	NB SB	4.5 4.5	7,579 8,628	53.5 48.1	38.2 > 45	E F	8 0	53.5 48.1	38.3 > 45	E F
9.	I-405 South of La Cienega Boulevard	NB SB	4.5 4.5	7,170 9,175	54.5 43.7	35.5 > 45	E F	0 0	54.5 43.7	35.5 > 45	E F
10.	I-405 South of Manchester Avenue	NB SB	4.5 4.5	7,545 8,002	53.6 51.8	38.0 41.7	E E	0 0	53.6 51.8	38.0 41.7	E E

TABLE LAXN-AS02-8A
FUTURE WITH PROJECT CONDITIONS (YEAR 2022)
FREEWAY SEGMENT A.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Future without Project (Year 2022)				Future with Project (Year 2022)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
11.	I-405 South of Century Boulevard	NB SB	4.5 4.5	7,930 6,679	52.1 55.0	41.1 32.8	E D	0 4	52.1 55.0	41.1 32.8	E D
12.	I-405 South of Imperial Highway	NB SB	4.5 5.5	6,104 7,402	55.0 55.0	30.0 29.1	D D	0 4	55.0 55.0	30.0 29.1	D D
13.	I-405 South of I-105	NB SB	4.5 4.5	6,875 6,701	54.9 55.0	33.9 33.0	D D	0 28	54.9 55.0	33.9 33.1	D D
14.	I-405 South of El Segundo Boulevard	NB SB	4.5 4.5	6,746 6,545	55.0 55.0	33.2 32.2	D D	40 28	55.0 55.0	33.4 32.4	D D
15.	I-405 South of Rosecrans Avenue	NB SB	4.5 4.5	9,127 6,682	43.9 55.0	> 45 32.9	F D	103 28	42.9 55.0	> 45 33.0	F D
16.	I-105 West of Hughes Way	EB WB	3 2	3,011 5,654	55.0 53.6	19.7 38.1	C E	47 8	55.0 53.5	20.1 38.2	C E
17.	I-105 West of Douglas Avenue	EB WB	3 3	3,209 5,480	55.0 54.2	21.1 36.5	C E	47 176	55.0 53.6	21.4 38.1	C E
18.	I-105 West of Imperial Highway	EB WB	3 4	1,130 6,575	55.0 46.9	7.4 > 45	A F	30 176	55.0 45.0	7.6 > 45	A F
19.	I-105 West of I-405	EB WB	3 4	2,489 4,232	55.0 55.0	16.5 21.1	B C	30 176	55.0 55.0	16.7 21.9	B C
20.	I-105 West of Hawthorne Avenue	EB WB	3.5 3.5	5,507 5,197	53.9 54.8	37.3 34.6	E D	30 176	53.8 54.4	37.5 36.1	E E

TABLE LAXN-AS02-8A
FUTURE WITH PROJECT CONDITIONS (YEAR 2022)
FREEWAY SEGMENT A.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Future without Project (Year 2022)				Future with Project (Year 2022)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
21.	I-105 West of Prairie Avenue	EB WB	3.5 3.5	5,826 6,960	52.4 41.5	40.6 > 45	E F	30 113	52.2 40.0	40.9 > 45	E F
22.	SR-90 West of Mindanao Way	EB WB	2 2	2,046 1,295	55.0 55.0	20.1 12.7	C B	0 0	55.0 55.0	20.1 12.7	C B
23.	SR-90 West of Culver Boulevard	EB WB	2 3	2,022 2,188	55.0 55.0	19.9 14.4	C B	0 0	55.0 55.0	19.9 14.4	C B
24.	SR-90 West of Centinela Avenue	EB WB	3 2	1,826 2,229	55.0 55.0	12.0 22.0	B C	28 15	55.0 55.0	12.2 22.1	B C
25.	SR-90 West of I-405	EB WB	3 4	3,651 2,918	55.0 55.0	24.0 14.4	C B	28 104	55.0 55.0	24.2 14.9	C B

TABLE LAXN-AS02-8B
FUTURE WITH PROJECT CONDITIONS (YEAR 2022)
FREEWAY SEGMENT P.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Future without Project (Year 2022)				Future with Project (Year 2022)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
1.	I-405 South of I-10	NB SB	4.5 5.5	7,728 9,024	53.0 54.5	39.3 35.7	E E	173 70	52.3 54.4	40.7 36.1	E E
2.	I-405 South of Venice Boulevard	NB SB	5.5 5.5	7,558 8,716	55.0 54.8	29.7 34.3	D D	173 70	55.0 54.8	30.3 34.6	D D
3.	I-405 South of Culver Boulevard	NB SB	5.5 5.5	7,789 8,551	55.0 55.0	30.6 33.6	D D	184 78	55.0 54.9	31.3 33.9	D D
4.	I-405 South of Braddock Drive	NB SB	5.5 5.5	7,849 8,796	55.0 54.8	30.8 34.7	D D	184 78	55.0 54.7	31.5 35.0	D D
5.	I-405 South of SR-90	NB SB	4.5 4.5	6,891 10,307	54.9 31.3	33.9 > 45	D F	184 78	54.7 30.3	34.9 > 45	D F
6.	I-405 South of Centinela Avenue	NB SB	4.5 5.5	9,613 9,107	39.4 54.3	> 45 36.2	F E	112 48	38.2 54.2	> 45 36.5	F E
7.	I-405 South of Howard Hughes Parkway	NB SB	4.5 4.5	7,376 7,624	54.1 53.3	36.8 38.6	E E	33 14	54.0 53.3	37.0 38.7	E E
8.	I-405 South of La Tijera Boulevard	NB SB	4.5 4.5	8,105 8,510	51.3 48.9	42.7 > 45	E F	33 0	51.1 48.9	43.0 > 45	E F
9.	I-405 South of La Cienega Boulevard	NB SB	4.5 4.5	8,069 8,681	51.5 47.7	42.3 > 45	E F	0 0	51.5 47.7	42.3 > 45	E F
10.	I-405 South of Manchester Avenue	NB SB	4.5 4.5	7,988 6,734	51.9 55.0	41.6 33.1	E D	0 0	51.9 55.0	41.6 33.1	E D

TABLE LAXN-AS02-8B
FUTURE WITH PROJECT CONDITIONS (YEAR 2022)
FREEWAY SEGMENT P.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Future without Project (Year 2022)				Future with Project (Year 2022)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
11.	I-405 South of Century Boulevard	NB SB	4.5 4.5	9,412 5,769	41.4 55.0	> 45 28.3	F D	0 18	41.4 55.0	> 45 28.4	F D
12.	I-405 South of Imperial Highway	NB SB	4.5 5.5	5,693 6,747	55.0 55.0	27.9 26.5	D D	0 18	55.0 55.0	27.9 26.6	D D
13.	I-405 South of I-105	NB SB	4.5 4.5	7,207 6,268	54.4 55.0	35.9 30.9	E D	0 82	54.4 55.0	35.9 31.3	E D
14.	I-405 South of El Segundo Boulevard	NB SB	4.5 4.5	6,965 6,767	54.8 55.0	34.4 33.3	D D	19 116	54.8 54.9	34.5 34.0	D D
15.	I-405 South of Rosecrans Avenue	NB SB	4.5 4.5	7,958 7,992	51.9 51.7	41.5 41.8	E E	49 116	51.6 51.1	42.0 43.0	E E
16.	I-105 West of Hughes Way	EB WB	3 2	4,056 4,400	55.0 55.0	26.6 28.9	D D	199 4	55.0 55.0	27.9 28.9	D D
17.	I-105 West of Douglas Avenue	EB WB	3 3	3,772 3,803	55.0 55.0	24.7 24.9	C C	199 84	55.0 55.0	26.1 25.5	D C
18.	I-105 West of Imperial Highway	EB WB	3 4	1,296 5,629	55.0 53.7	8.5 37.8	A E	127 84	55.0 53.3	9.3 38.7	A E
19.	I-105 West of I-405	EB WB	3 4	3,481 3,028	55.0 55.0	23.1 15.1	C B	127 84	55.0 55.0	23.9 15.5	C B
20.	I-105 West of Hawthorne Avenue	EB WB	3.5 3.5	5,681 4,111	53.2 55.0	39.0 27.3	E D	127 84	52.5 55.0	40.4 27.8	E D

TABLE LAXN-AS02-8B
FUTURE WITH PROJECT CONDITIONS (YEAR 2022)
FREEWAY SEGMENT P.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Future without Project (Year 2022)				Future with Project (Year 2022)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
21.	I-105 West of Prairie Avenue	EB WB	3.5 3.5	6,119 5,268	50.4 54.6	44.3 35.2	E E	127 54	49.3 54.5	> 45 35.6	F E
22.	SR-90 West of Mindanao Way	EB WB	2 2	1,975 1,281	55.0 55.0	19.4 12.6	C B	0 0	55.0 55.0	19.4 12.6	C B
23.	SR-90 West of Culver Boulevard	EB WB	2 3	1,985 2,198	55.0 55.0	19.6 14.5	C B	0 0	55.0 55.0	19.6 14.5	C B
24.	SR-90 West of Centinela Avenue	EB WB	3 2	2,255 2,246	55.0 55.0	14.8 22.1	B C	118 7	55.0 55.0	15.6 22.2	B C
25.	SR-90 West of I-405	EB WB	3 4	3,241 3,585	55.0 55.0	21.3 17.7	C B	118 50	55.0 55.0	22.1 17.9	C B

TABLE LAXN-AS02-9A
FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2022)
FREEWAY SEGMENT A.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Future without Project (Year 2022)				Future with Project with Mitigation (Year 2022)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
1.	I-405 South of I-10	NB SB	4.5 5.5	9,317 7,973	42.4 55.0	> 45 31.3	F D	54 140	41.9 55.0	> 45 31.8	F D
2.	I-405 South of Venice Boulevard	NB SB	5.5 5.5	9,334 8,262	53.9 55.0	37.4 32.4	E D	54 140	53.7 55.0	37.7 33.0	E D
3.	I-405 South of Culver Boulevard	NB SB	5.5 5.5	9,018 8,274	54.5 55.0	35.7 32.5	E D	42 156	54.4 55.0	35.9 33.1	E D
4.	I-405 South of Braddock Drive	NB SB	5.5 5.5	7,738 9,273	55.0 54.0	30.4 37.1	D E	42 156	55.0 53.6	30.5 37.9	D E
5.	I-405 South of SR-90	NB SB	4.5 4.5	7,854 10,490	52.5 28.8	40.3 > 45	E F	42 156	52.3 26.6	40.7 > 45	E F
6.	I-405 South of Centinela Avenue	NB SB	4.5 5.5	7,449 9,750	53.9 52.7	37.3 40.0	E E	26 94	53.8 52.4	37.5 40.6	E E
7.	I-405 South of Howard Hughes Parkway	NB SB	4.5 4.5	8,070 6,788	51.5 55.0	42.3 33.3	E D	7 28	51.4 55.0	42.4 33.5	E D
8.	I-405 South of La Tijera Boulevard	NB SB	4.5 4.5	7,579 8,628	53.5 48.1	38.2 > 45	E F	7 0	53.5 48.1	38.3 > 45	E F
9.	I-405 South of La Cienega Boulevard	NB SB	4.5 4.5	7,170 9,175	54.5 43.7	35.5 > 45	E F	0 0	54.5 43.7	35.5 > 45	E F
10.	I-405 South of Manchester Avenue	NB SB	4.5 4.5	7,545 8,002	53.6 51.8	38.0 41.7	E E	0 0	53.6 51.8	38.0 41.7	E E

TABLE LAXN-AS02-9A
FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2022)
FREEWAY SEGMENT A.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Future without Project (Year 2022)				Future with Project with Mitigation (Year 2022)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
11.	I-405 South of Century Boulevard	NB SB	4.5 4.5	7,930 6,679	52.1 55.0	41.1 32.8	E D	0 4	52.1 55.0	41.1 32.8	E D
12.	I-405 South of Imperial Highway	NB SB	4.5 5.5	6,104 7,402	55.0 55.0	30.0 29.1	D D	0 4	55.0 55.0	30.0 29.1	D D
13.	I-405 South of I-105	NB SB	4.5 4.5	6,875 6,701	54.9 55.0	33.9 33.0	D D	0 27	54.9 55.0	33.9 33.1	D D
14.	I-405 South of El Segundo Boulevard	NB SB	4.5 4.5	6,746 6,545	55.0 55.0	33.2 32.2	D D	38 27	55.0 55.0	33.4 32.4	D D
15.	I-405 South of Rosecrans Avenue	NB SB	4.5 4.5	9,127 6,682	43.9 55.0	> 45 32.9	F D	98 27	43.0 55.0	> 45 33.0	F D
16.	I-105 West of Hughes Way	EB WB	3 2	3,011 5,654	55.0 53.6	19.7 38.1	C E	45 7	55.0 53.6	20.0 38.1	C E
17.	I-105 West of Douglas Avenue	EB WB	3 3	3,209 5,480	55.0 54.2	21.1 36.5	C E	45 168	55.0 53.6	21.3 38.0	C E
18.	I-105 West of Imperial Highway	EB WB	3 4	1,130 6,575	55.0 46.9	7.4 > 45	A F	29 168	55.0 45.1	7.6 > 45	A F
19.	I-105 West of I-405	EB WB	3 4	2,489 4,232	55.0 55.0	16.5 21.1	B C	29 168	55.0 55.0	16.7 21.9	B C
20.	I-105 West of Hawthorne Avenue	EB WB	3.5 3.5	5,507 5,197	53.9 54.8	37.3 34.6	E D	29 168	53.8 54.4	37.5 36.0	E E

TABLE LAXN-AS02-9A
FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2022)
FREEWAY SEGMENT A.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Future without Project (Year 2022)				Future with Project with Mitigation (Year 2022)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
21.	I-105 West of Prairie Avenue	EB WB	3.5 3.5	5,826 6,960	52.4 41.5	40.6 > 45	E F	29 108	52.2 40.0	40.9 > 45	E F
22.	SR-90 West of Mindanao Way	EB WB	2 2	2,046 1,295	55.0 55.0	20.1 12.7	C B	0 0	55.0 55.0	20.1 12.7	C B
23.	SR-90 West of Culver Boulevard	EB WB	2 3	2,022 2,188	55.0 55.0	19.9 14.4	C B	0 0	55.0 55.0	19.9 14.4	C B
24.	SR-90 West of Centinela Avenue	EB WB	3 2	1,826 2,229	55.0 55.0	12.0 22.0	B C	27 14	55.0 55.0	12.2 22.1	B C
25.	SR-90 West of I-405	EB WB	3 4	3,651 2,918	55.0 55.0	24.0 14.4	C B	27 102	55.0 55.0	24.2 14.9	C B

TABLE LAXN-AS02-9B
FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2022)
FREEWAY SEGMENT P.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Future without Project (Year 2022)				Future with Project with Mitigation (Year 2022)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
1.	I-405 South of I-10	NB SB	4.5 5.5	7,728 9,024	53.0 54.5	39.3 35.7	E E	166 68	52.3 54.4	40.7 36.1	E E
2.	I-405 South of Venice Boulevard	NB SB	5.5 5.5	7,558 8,716	55.0 54.8	29.7 34.3	D D	166 68	55.0 54.8	30.3 34.6	D D
3.	I-405 South of Culver Boulevard	NB SB	5.5 5.5	7,789 8,551	55.0 55.0	30.6 33.6	D D	176 75	55.0 54.9	31.3 33.9	D D
4.	I-405 South of Braddock Drive	NB SB	5.5 5.5	7,849 8,796	55.0 54.8	30.8 34.7	D D	177 75	55.0 54.7	31.5 35.0	D D
5.	I-405 South of SR-90	NB SB	4.5 4.5	6,891 10,307	54.9 31.3	33.9 > 45	D F	177 75	54.7 30.3	34.8 > 45	D F
6.	I-405 South of Centinela Avenue	NB SB	4.5 5.5	9,613 9,107	39.4 54.3	> 45 36.2	F E	107 46	38.2 54.2	> 45 36.5	F E
7.	I-405 South of Howard Hughes Parkway	NB SB	4.5 4.5	7,376 7,624	54.1 53.3	36.8 38.6	E E	32 13	54.0 53.3	37.0 38.7	E E
8.	I-405 South of La Tijera Boulevard	NB SB	4.5 4.5	8,105 8,510	51.3 48.9	42.7 > 45	E F	32 0	51.1 48.9	43.0 > 45	E F
9.	I-405 South of La Cienega Boulevard	NB SB	4.5 4.5	8,069 8,681	51.5 47.7	42.3 > 45	E F	0 0	51.5 47.7	42.3 > 45	E F
10.	I-405 South of Manchester Avenue	NB SB	4.5 4.5	7,988 6,734	51.9 55.0	41.6 33.1	E D	0 0	51.9 55.0	41.6 33.1	E D

TABLE LAXN-AS02-9B
FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2022)
FREEWAY SEGMENT P.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Future without Project (Year 2022)				Future with Project with Mitigation (Year 2022)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
11.	I-405 South of Century Boulevard	NB SB	4.5 4.5	9,412 5,769	41.4 55.0	> 45 28.3	F D	0 17	41.4 55.0	> 45 28.4	F D
12.	I-405 South of Imperial Highway	NB SB	4.5 5.5	5,693 6,747	55.0 55.0	27.9 26.5	D D	0 17	55.0 55.0	27.9 26.6	D D
13.	I-405 South of I-105	NB SB	4.5 4.5	7,207 6,268	54.4 55.0	35.9 30.9	E D	0 79	54.4 55.0	35.9 31.3	E D
14.	I-405 South of El Segundo Boulevard	NB SB	4.5 4.5	6,965 6,767	54.8 55.0	34.4 33.3	D D	18 111	54.8 54.9	34.5 33.9	D D
15.	I-405 South of Rosecrans Avenue	NB SB	4.5 4.5	7,958 7,992	51.9 51.7	41.5 41.8	E E	47 111	51.7 51.1	42.0 42.9	E E
16.	I-105 West of Hughes Way	EB WB	3 2	4,056 4,400	55.0 55.0	26.6 28.9	D D	191 4	55.0 55.0	27.9 28.9	D D
17.	I-105 West of Douglas Avenue	EB WB	3 3	3,772 3,803	55.0 55.0	24.7 24.9	C C	191 81	55.0 55.0	26.0 25.5	C C
18.	I-105 West of Imperial Highway	EB WB	3 4	1,296 5,629	55.0 53.7	8.5 37.8	A E	122 81	55.0 53.3	9.3 38.6	A E
19.	I-105 West of I-405	EB WB	3 4	3,481 3,028	55.0 55.0	23.1 15.1	C B	122 81	55.0 55.0	23.9 15.5	C B
20.	I-105 West of Hawthorne Avenue	EB WB	3.5 3.5	5,681 4,111	53.2 55.0	39.0 27.3	E D	122 81	52.5 55.0	40.3 27.8	E D

TABLE LAXN-AS02-9B
FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2022)
FREEWAY SEGMENT P.M. PEAK HOUR LEVELS OF SERVICE

No.	Freeway Segment	Direction	Number of Lanes	Future without Project (Year 2022)				Future with Project with Mitigation (Year 2022)			
				Volume	Speed	Density	LOS	Project Traffic	Speed	Density	LOS
21.	I-105 West of Prairie Avenue	EB WB	3.5 3.5	6,119 5,268	50.4 54.6	44.3 35.2	E E	122 52	49.4 54.5	> 45 35.6	F E
22.	SR-90 West of Mindanao Way	EB WB	2 2	1,975 1,281	55.0 55.0	19.4 12.6	C B	0 0	55.0 55.0	19.4 12.6	C B
23.	SR-90 West of Culver Boulevard	EB WB	2 3	1,985 2,198	55.0 55.0	19.6 14.5	C B	0 0	55.0 55.0	19.6 14.5	C B
24.	SR-90 West of Centinela Avenue	EB WB	3 2	2,255 2,246	55.0 55.0	14.8 22.1	B C	116 7	55.0 55.0	15.6 22.2	B C
25.	SR-90 West of I-405	EB WB	3 4	3,241 3,585	55.0 55.0	21.3 17.7	C B	116 49	55.0 55.0	22.1 17.9	C B

TABLE LAXN-AS02-10
SUPPLEMENTAL OFF-RAMPS EVALUATION USING MORE CONSERVATIVE ASSUMPTIONS

No.	Intersection	Ramp and Lane Description	Ramp Length (ft)	Vehicle Storage Capacity (Car Lengths)	Peak Hour	Existing Conditions (Year 2012)		Existing with Project Conditions (Year 2012)		Future without Project Conditions (Year 2022)		Future with Project Conditions (Year 2022)	
						85th Percentile Vehicle Queue Length	Exceeds Capacity?	85th Percentile Vehicle Queue Length	Exceeds Capacity?	85th Percentile Vehicle Queue Length	Exceeds Capacity?	85th Percentile Vehicle Queue Length	Exceeds Capacity?
104.	Culver Boulevard & CA-90 EB Off-ramp	CA-90 Eastbound Off-ramp to Culver Boulevard											
		Left-Turn Lane	500	16	A.M. P.M.	8 16		9 16		9 16		10 16	
		Through Lane	500	16	A.M. P.M.	11 5		11 5		12 6		12 6	
		Shared Through/Right-Turn Lane	250	8	A.M. P.M.	8 5		8 5		8 6		8 6	
		Ramp	775	25	A.M. P.M.	3 6	NO NO	3 7	NO NO	4 11	NO NO	4 11	NO NO
74.	Centinela Avenue & CA-90 EB Off-ramp	CA-90 Eastbound Off-ramp to Centinela Avenue											
		Left-Turn Lane	485	16	A.M. P.M.	5 6		7 6		6 6		8 6	
		Shared Left-Turn/Through/Right-Turn Lane	725	24	A.M. P.M.	13 15		15 16		16 16		17 17	
		Right-Turn Lane	725	24	A.M. P.M.	10 12		11 12		12 13		12 13	
		Ramp	525	17	A.M. P.M.	0 0	NO NO	0 0	NO NO	0 0	NO NO	0 0	NO NO
33.	Sepulveda Boulevard & I-105 WB Off-Ramp	I-105 Westbound Off-ramp to Northbound Sepulveda Boulevard											
		Right-Turn Lanes (3)	5185	172	A.M. P.M.	47 54		55 62		48 55		55 63	
		Ramp	0	0	A.M. P.M.	0 0	NO NO	0 0	NO NO	0 0	NO NO	0 0	NO NO
106.	Howard Hughes Parkway & I-405 SB Off-ramp	I-405 Southbound Off-ramp to Howard Hughes Parkway											
		Left-Turn Lane	195	6	A.M. P.M.	1 1		1 1		1 1		1 1	
		Right-Turn Lanes (2)	2070	69	A.M. P.M.	3 4		4 4		4 5		4 5	
		Ramp	390	13	A.M. P.M.	0 0	NO NO	0 0	NO NO	0 0	NO NO	0 0	NO NO
41.	La Tijera Boulevard & I-405 SB Off-ramp	I-405 Southbound Off-ramp to La Tijera Boulevard											
		Shared Left-Turn/Right-Turn Lane	475	15	A.M.	13		13		14		14	

TABLE LAXN-AS02-10
SUPPLEMENTAL OFF-RAMPS EVALUATION USING MORE CONSERVATIVE ASSUMPTIONS

No.	Intersection	Ramp and Lane Description	Ramp Length (ft)	Vehicle Storage Capacity (Car Lengths)	Peak Hour	Existing Conditions (Year 2012)		Existing with Project Conditions (Year 2012)		Future without Project Conditions (Year 2022)		Future with Project Conditions (Year 2022)	
						85th Percentile Vehicle Queue Length	Exceeds Capacity?	85th Percentile Vehicle Queue Length	Exceeds Capacity?	85th Percentile Vehicle Queue Length	Exceeds Capacity?	85th Percentile Vehicle Queue Length	Exceeds Capacity?
					P.M.	15		15		15		15	
		Right-Turn Lane	475	15	A.M. P.M.	9 10		10 11		10 11		11 12	
		Ramp	800	26	A.M. P.M.	0 4	NO NO	0 5	NO NO	0 5	NO NO	0 6	NO NO
50.	Manchester Avenue & I-405 NB Off-Ramp	I-405 Northbound Off-ramp to Manchester Avenue											
		Left-Turn Lane	725	24	A.M. P.M.	9 9		10 10		10 10		11 11	
		Shared Left-Turn/Through/Right-Turn Lane	725	24	A.M. P.M.	19 24		20 24		22 24		23 24	
		Right-Turn Lane	125	4	A.M. P.M.	4 4		4 4		4 4		4 4	
		Ramp	705	23	A.M. P.M.	1 8	NO NO	1 10	NO NO	1 13	NO NO	1 15	NO NO
64.	Century Boulevard & I-405 NB Off-Ramp	I-405 Northbound Off-ramp to Century Boulevard											
		Left-Turn Lanes (2)	900	30	A.M. P.M.	15 8		15 8		17 8		18 8	
		Right-Turn Lane	450	15	A.M. P.M.	3 15		3 15		4 15		4 15	
		Ramp	1500	50	A.M. P.M.	0 0	NO NO	0 0	NO NO	0 1	NO NO	0 1	NO NO

TABLE LAXN-AR02-1
EXISTING WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2012)
REDUCED BUS MITIGATION CREDIT - SIGNIFICANT INTERSECTION IMPACT ANALYSIS

No.	City	Intersection	Peak Hour	Existing without Project		Existing with Project				Existing with Project with Mitigation			
				V/C	LOS	V/C	LOS	Δ V/C	Impact	V/C	LOS	Δ V/C	Impact
12.	LA	Lincoln Boulevard & Manchester Avenue	A.M. P.M.	0.600 0.645	A B	0.652 0.761	B C	0.052 0.116	NO **YES**	0.543 0.689	A B	-0.057 0.044	NO NO
16.	LA	Pershing Drive & Manchester Avenue	A.M. P.M.	0.455 0.381	A A	0.461 0.405	A A	0.006 0.024	NO NO	0.461 0.405	A A	0.006 0.024	NO NO
28.	LA	Sepulveda Boulevard & Manchester Avenue	A.M. P.M.	0.750 0.767	C C	0.780 0.828	C D	0.030 0.061	NO **YES**	0.649 0.766	B C	-0.101 -0.001	NO NO
39.	LA	La Tijera Boulevard & Manchester Avenue	A.M. P.M.	0.455 0.515	A A	0.520 0.596	A A	0.065 0.081	NO NO	0.507 0.584	A A	0.052 0.069	NO NO
46.	LA	Airport Boulevard & Manchester Avenue	A.M. P.M.	0.578 0.806	A D	0.640 0.865	B D	0.062 0.059	NO **YES**	0.599 0.801	A D	0.021 -0.005	NO NO
47.	IW	Aviation Boulevard / Florence Avenue & Manchester Avenue	A.M. P.M.	0.601 0.685	B B	0.661 0.726	B C	0.060 0.041	NO **YES**	0.637 0.705	B C	0.036 0.020	NO NO
49.	IW	La Cienega Boulevard & Manchester Avenue	A.M. P.M.	0.596 0.828	A D	0.601 0.847	B D	0.005 0.019	NO NO	0.584 0.830	A D	-0.012 0.002	NO NO
50.	IW	Ash Avenue / I-405 Northbound Ramps & Manchester Avenue	A.M. P.M.	0.624 0.711	B C	0.648 0.735	B C	0.024 0.024	NO NO	0.631 0.715	B C	0.007 0.004	NO NO
51.	IW	Inglewood Avenue & Manchester Avenue	A.M. P.M.	0.471 0.597	A A	0.498 0.622	A B	0.027 0.025	NO NO	0.477 0.601	A B	0.006 0.004	NO NO
53.	IW	La Brea Avenue & Manchester Avenue	A.M. P.M.	0.689 0.739	B C	0.698 0.751	B C	0.009 0.012	NO NO	0.687 0.741	B C	-0.002 0.002	NO NO

TABLE LAXN-AR02-1
EXISTING WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2012)
REDUCED BUS MITIGATION CREDIT - SIGNIFICANT INTERSECTION IMPACT ANALYSIS

No.	City	Intersection	Peak Hour	Existing without Project		Existing with Project				Existing with Project with Mitigation			
				V/C	LOS	V/C	LOS	Δ V/C	Impact	V/C	LOS	Δ V/C	Impact
91.	LA	Falmouth Avenue & Manchester Avenue	A.M. P.M.	0.125 0.107	A A	0.137 0.125	A A	0.012 0.018	NO NO	0.134 0.122	A A	0.009 0.015	NO NO
96.	LA	Emerson Avenue & Manchester Avenue	A.M. P.M.	0.447 0.380	A A	0.493 0.416	A A	0.046 0.036	NO NO	0.489 0.412	A A	0.042 0.032	NO NO

Notes:

LA = Los Angeles; CC = Culver City; MB = Manhattan Beach; ES = El Segundo; IW = Inglewood; HT = Hawthorne; LAC = Los Angeles County

TABLE LAXN-AR02-2
FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2022)
REDUCED BUS MITIGATION CREDIT - SIGNIFICANT INTERSECTION IMPACT ANALYSIS

No.	City	Intersection	Peak Hour	Future without Project		Future with Project				Future with Project with Mitigation			
				V/C	LOS	V/C	LOS	Δ V/C	Impact	V/C	LOS	Δ V/C	Impact
12.	LA	Lincoln Boulevard & Manchester Avenue	A.M. P.M.	0.615 0.692	B B	0.725 0.812	C D	0.110 0.120	**YES** **YES**	0.606 0.724	B C	-0.009 0.032	NO NO
16.	LA	Pershing Drive & Manchester Avenue	A.M. P.M.	0.461 0.411	A A	0.467 0.437	A A	0.006 0.026	NO NO	0.467 0.435	A A	0.006 0.024	NO NO
28.	LA	Sepulveda Boulevard & Manchester Avenue	A.M. P.M.	0.768 0.834	C D	0.798 0.896	C D	0.030 0.062	NO **YES**	0.667 0.812	B D	-0.101 -0.022	NO NO
39.	LA	La Tijera Boulevard & Manchester Avenue	A.M. P.M.	0.515 0.553	A A	0.579 0.635	A B	0.064 0.082	NO NO	0.567 0.622	A B	0.052 0.069	NO NO
46.	LA	Airport Boulevard & Manchester Avenue	A.M. P.M.	0.653 0.917	B E	0.715 0.976	C E	0.062 0.059	**YES** **YES**	0.667 0.907	B E	0.014 -0.010	NO NO
47.	IW	Aviation Boulevard / Florence Avenue & Manchester Avenue	A.M. P.M.	0.684 0.836	B D	0.736 0.877	C D	0.052 0.041	**YES** **YES**	0.713 0.855	C D	0.029 0.019	NO NO
49.	IW	La Cienega Boulevard & Manchester Avenue	A.M. P.M.	0.697 0.911	B E	0.702 0.932	C E	0.005 0.021	NO **YES**	0.685 0.914	B E	-0.012 0.003	NO NO
50.	IW	Ash Avenue / I-405 Northbound Ramps & Manchester Avenue	A.M. P.M.	0.677 0.775	B C	0.701 0.799	C C	0.024 0.024	NO NO	0.684 0.778	B C	0.007 0.003	NO NO
51.	IW	Inglewood Avenue & Manchester Avenue	A.M. P.M.	0.546 0.679	A B	0.573 0.704	A C	0.027 0.025	NO NO	0.552 0.683	A B	0.006 0.004	NO NO
53.	IW	La Brea Avenue & Manchester Avenue	A.M. P.M.	0.793 0.870	C D	0.801 0.883	D D	0.008 0.013	NO NO	0.791 0.873	C D	-0.002 0.003	NO NO
91.	LA	Falmouth Avenue &	A.M.	0.146	A	0.159	A	0.013	NO	0.155	A	0.009	NO

TABLE LAXN-AR02-2
FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2022)
REDUCED BUS MITIGATION CREDIT - SIGNIFICANT INTERSECTION IMPACT ANALYSIS

No.	City	Intersection	Peak Hour	Future without Project		Future with Project				Future with Project with Mitigation			
				V/C	LOS	V/C	LOS	Δ V/C	Impact	V/C	LOS	Δ V/C	Impact
		Manchester Avenue	P.M.	0.128	A	0.145	A	0.017	NO	0.142	A	0.014	NO
96.	LA	Emerson Avenue & Manchester Avenue	A.M. P.M.	0.499 0.425	A A	0.545 0.462	A A	0.046 0.037	NO NO	0.541 0.458	A A	0.042 0.033	NO NO

Notes:

LA = Los Angeles; CC = Culver City; MB = Manhattan Beach; ES = El Segundo; IW = Inglewood; HT = Hawthorne; LAC = Los Angeles County

TABLE LAXN-AR02-3

EXISTING TRANSIT SERVICE SERVING STUDY AREA - WITH UPDATED TRANSIT LINES

Provider, Route, and Service Area		Service Type	Hours of Operation	Average Headway (minutes)			
				Morning		Afternoon	
				NB/EB	SB/WB	NB/EB	SB/WB
Metro Bus							
33	Downtown Los Angeles - Santa Monica via Venice Boulevard	Late Night	11:30 P.M - 4:30 A.M.	N/A	N/A	N/A	N/A
37	Downtown Los Angeles - Washington / Fairfax Transit Hub via Adams Boulevard	Local	4:30 A.M. - 1:30 A.M.	7	9	10	7
38	17th / Broadway - Washington / Fairfax via West Jefferson Boulevard	Local	4:00 A.M. - 1:00 A.M.	18	22	24	18
35	Downtown Los Angeles - Washington / Fairfax Transit Hub via Washington Boulevard	Local	4:30 A.M. - 12:00 A.M.	12	12	12	12
40	Downtown Los Angeles - LAX - South Bay - Galleria via King - La Tijera - Hawthorne	Local	24 - Hour	9	10	10	9
102	Baldwin Village - South Gate via Coliseum Street	Local	5:30 A.M. - 9:00 P.M.	48	40	48	48
105	West Hollywood - Vernon via La Cienega Boulevard - Vernon Avenue	Local	4:00 A.M. - 10:00 P.M.	17	16	16	17
108	Marina Del Rey - Pico Rivera via Slauson Avenue	Local	4:00 A.M. - 11:00 P.M.	11	10	11	13
110	Playa Vista - Bell Gardnes via Jefferson Boulevard - Gage Avenue	Local	5:00 A.M. - 11:00 P.M.	24	18	22	20
111	LAX City Bus Center - Norwalk Station via Florence Avenue	Local	4:00 A.M. - 10:00 P.M.	34	120	80	48

TABLE LAXN-AR02-3

EXISTING TRANSIT SERVICE SERVING STUDY AREA - WITH UPDATED TRANSIT LINES

Provider, Route, and Service Area		Service Type	Hours of Operation	Average Headway (minutes)			
				Morning		Afternoon	
				NB/EB	SB/WB	NB/EB	SB/WB
115	Playa del Rey - Norwalk via Manchester - Firestone	Local	5:00 A.M. - 12:30 A.M.	12	9	9	10
117	LAX City Bus Center - Downey via Century Boulevard & Imperial Highway	Local	5:00 A.M. - 2:00 A.M.	22	20	22	20
125	El Segundo - Norwalk Station via Rosecrans Avenue	Local	4:30 A.M. - 9:30 P.M.	30	24	27	24
126	Manhattan Beach - Hawthorne Station via Manhattan Beach Boulevard	Local	6:30 A.M. - 6:30 P.M.	80	80	80	80
211	Inglewood - Redondo Beach via Prairie Avenue, Inglewood Avenue	Local	6:00 A.M. - 7:00 P.M.	30	34	30	30
212	Hollywood / Vine Station - Hawthorne Station via La Brea Avenue	Local	4:30 A.M. - 1:30 A.M.	17	30	27	15
215	Inglewood - Redondo Beach via Prairie Avenue, Inglewood Avenue	Local	6:00 A.M. - 7:00 P.M.	48	34	30	48
220	Beverly Center - Culver City via Robertson Boulevard	Local	6:00 A.M. - 7:00 P.M.	48	48	48	48
232	LAX City Bus Center - Long Beach via Sepulveda Boulevard & Pacific Coast Highway	Local	4:00 A.M. - 11:30 P.M.	20	20	20	24
311	LAX City Bus Center - Norwalk Station via Florence Avenue	Limited	6:00 A.M. - 7:00 P.M.	48	24	27	27
358	Marina del Rey - Pico Rivera via Slauson Avenue	Limited	5:30 A.M. - 7:00 P.M.	34	N/A	N/A	22

TABLE LAXN-AR02-3

EXISTING TRANSIT SERVICE SERVING STUDY AREA - WITH UPDATED TRANSIT LINES

Provider, Route, and Service Area		Service Type	Hours of Operation	Average Headway (minutes)			
				Morning		Afternoon	
				NB/EB	SB/WB	NB/EB	SB/WB
607	Windsor Hills - Inglewood Shuttle	Shuttle	5:30 A.M. - 7:30 P.M.	48	N/A	60	N/A
625	Metro Green Line Shuttle	Shuttle	5:00 A.M. - 8:00 P.M.	24	24	24	22
705	West Hollywood - Vernon via La Cienega Boulevard - Vernon Avenue	Rapid	5:00 A.M. - 9:00 P.M.	13	16	14	12
740	Downtown Los Angeles - Redondo Beach via Hawthorne Boulevard & Martin Luther King Jr. Boulevard	Rapid	4:30 A.M. - 9:00 P.M.	13	18	17	17
Metro Rail							
Green	Norwalk - LAX - Redondo Beach	LRT	3:30 A.M. - 12:30 A.M.	9	8	8	8
LAX Shuttle							
C	LAX Parking Lot C	Shuttle	24 - Hour	13	13	13	13
G	LAX Parking Lot E	Shuttle	24 - Hour	13	13	13	13
Santa Monica Big Blue Bus							
BBB2	Venice - UCLA	Local	6:30 A.M. - 10:30 P.M.	20	20	20	18
BBB3	Montana Avenue & Lincoln Boulevard	Local	5:30 A.M. - 12:30 A.M.	15	14	16	15
BBB6	Santa Monica College Commuter	Limited	7:00 A.M. - 7:00 P.M.	45	N/A	90	90

TABLE LAXN-AR02-3

EXISTING TRANSIT SERVICE SERVING STUDY AREA - WITH UPDATED TRANSIT LINES

Provider, Route, and Service Area		Service Type	Hours of Operation	Average Headway (minutes)			
				Morning		Afternoon	
				NB/EB	SB/WB	NB/EB	SB/WB
BBB12	Westwood Boulevard & Palms Boulevard	Local	6:00 A.M - 11:30 P.M.	16	17	15	13
BBB14	Bundy Drive & Centinela Avenue	Local	6:00 A.M. - 9:00 P.M.	13	16	13	15
BBBR3	Santa Monica - Metro Green Line Station	Rapid	6:00 A.M. - 9:00 P.M.	16	17	16	16
Culver City Bus							
C1	Venice Beach - Washington / Fairfax cia Washington Boulevard	Local	6:00 A.M. - 11:30 A.M.	14	13	11	12
C2	Washington / Lincoln - Culver City Transit Center	Local	6:00 A.M. - 6:00 P.M.	60	48	60	60
C3	Century City - Culver City Transit Center	Local	5:30 A.M. - 11:30 P.M.	20	20	20	20
C4	Washington / Fairfax - West Los Angeles College - Culver City Transit Center	Local	6:00 A.M. - 6:00 P.M.	48	80	60	45
C5	Blair Hills - Washington / Inglewood	School	7:00 A.M. - 4:00 P.M.	N/A	N/A	120	N/A
C6	UCLA - Metro Green Line Station via Sepulveda Boulevard	Local	5:00 A.M. - 12:00 A.M.	17	18	18	20
C7	Venice / Culver - Marina del Rey	Local	5:30 A.M. - 7:00 P.M.	60	60	60	60
CR6	UCLA - Metro Green Line Station via Sepulveda Boulevard	Rapid	6:00 A.M. - 6:30 P.M.	15	15	15	15
LADOT Commuter Express							

TABLE LAXN-AR02-3

EXISTING TRANSIT SERVICE SERVING STUDY AREA - WITH UPDATED TRANSIT LINES

Provider, Route, and Service Area		Service Type	Hours of Operation	Average Headway (minutes)			
				Morning		Afternoon	
				NB/EB	SB/WB	NB/EB	SB/WB
CE437	Downtown Los Angeles - Culver City - Marina del Rey - Venice	Express	6:00 A.M. - 7:30 P.M.	30	N/A	N/A	40
CE438	Downtown Los Angeles - Redondo Beach	Express	6:00 A.M. - 7:30 P.M.	18	N/A	N/A	24
CE574	LAX / El Segundo - Encino / Granada Hills	Express	5:00 A.M. - 7:30 P.M.	36	N/A	N/A	48
Torrance Transit							
T8	Torrance - LAX	Local	5:00 A.M. - 10:30 P.M.	60	40	40	40
Beach Cities Transit							
BCT109	Hermosa Beach - LAX City Transit Center	Local	6:00 A.M. - 10:00 P.M.	22	22	22	22
Gardena Municipal Lines							
GA5	Imperial Station - Aviation Station	Local	5:30 A.M. - 9:00 P.M.	27	30	27	30
Lawndale Beat							
EX	Hawthorne Boulevard - Metro Green Line Station	Local	7:00 A.M. - 6:00 P.M.	45	45	45	36
RES	Hawthorne Boulevard - Metro Green Line Station	Express	7:00 A.M. - 6:00 P.M.	45	60	45	36

Notes:
LADOT - Los Angeles Department of Transportation Transit Services

TABLE LAXN-AR02-4
EXISTING TRANSIT SERVICE PATRONAGE AND RESIDUAL CAPACITY
LINES SERVING PROJECT PERIPHERY - WITH UPDATED TRANSIT LINES

Morning Peak Hour						
Provider and Route	**Number of Runs During Peak Hour** [a]	**Capacity** [b]	**Average Load** [c]	**Load Factor - Load/Capacity** [d]	**Residual Capacity per Run**	**Residual Capacity in Peak Hour** [e]
Metro Bus						
111/311	6	50	39	0.78	11	66
115	12	50	34	0.68	16	192
117	6	50	38	0.76	12	72
232	6	50	35	0.70	15	90
Metro Rail						
Green	14	152	60	0.39	93	1,302
LADOT Commuter Express						
574	6	49	24	0.49	25	150
Santa Monica Big Blue Bus						
3	9	60	38	0.63	22	198
R3	9	60	37	0.62	23	207
Torrance Transit						
8	7	60	50	0.83	10	70
Culver City Bus [e]						
C6	7	n/a	n/a	n/a	n/a	n/a
CR6	8	n/a	n/a	n/a	n/a	n/a
Beach Cities Transit [e]						
109	6	n/a	n/a	n/a	n/a	n/a
					Total Residual Capacity in Peak Hour	**2,347**

TABLE LAXN-AR02-4
EXISTING TRANSIT SERVICE PATRONAGE AND RESIDUAL CAPACITY
LINES SERVING PROJECT PERIPHERY - WITH UPDATED TRANSIT LINES

Afternoon Peak Hour						
Provider and Route	**Number of Runs During Peak Hour** [a]	**Capacity** [b]	**Average Load** [c]	**Load Factor - Load/Capacity** [d]	**Residual Capacity per Run**	**Residual Capacity in Peak Hour** [e]
Metro Bus						
111/311	7	50	39	0.78	11	77
115	12	50	39	0.78	11	132
117	6	50	41	0.82	9	54
232	7	50	34	0.68	16	112
Metro Rail						
Green	16	152	66	0.43	87	1,392
LADOT Commuter Express						
574	2	49	22	0.45	27	54
Santa Monica Big Blue Bus						
3	9	60	41	0.68	19	171
R3	8	60	29	0.48	31	248
Torrance Transit						
8	8	60	38	0.63	22	176
Culver City Bus [e]						
C6	6	n/a	n/a	n/a	n/a	n/a
CR6	8	n/a	n/a	n/a	n/a	n/a
Beach Cities Transit [e]						
574	6	n/a	n/a	n/a	n/a	n/a

TABLE LAXN-AR02-4
EXISTING TRANSIT SERVICE PATRONAGE AND RESIDUAL CAPACITY
LINES SERVING PROJECT PERIPHERY - WITH UPDATED TRANSIT LINES

Total Residual Capacity in Peak Hour	**2,416**

Notes:

Metro: Los Angeles County Metropolitan Transportation Authority.

LADOT: Los Angeles Department of Transportation

[a] Number of runs in both directions combined during peak hour.

[b] Capacity assumptions:

Metro Regular Bus - 40 seated + 10 standing = 50.

Metro Articulated Bus - 66 seated + 9 standing = 75.

LADOT Commuter Express Bus - 49 seated.

Santa Monica Big Blue Bus - 50 seated + 10 standing = 60.

Torrance Transit - 45 seated + 15 standing = 60

[c] Local Bus Route: Average load is the average peak load of 5 consecutive runs, 2 runs before and 2 after the maximum load observed.

Commuter Bus Route: Average load is the average number of passengers on all runs during peak period.

[d] Residual capacity in peak period = (residual capacity per run) x (number of peak period runs).

[e] No applicable data was available for Culver City Bus or Beach Cities Transit bus lines.

TABLE LAXN-AR02-5
CMP TRANSIT CAPACITY ANALYSIS WITH UPDATED TRANSIT LINES

Morning Peak Hour						
Provider and Route	**Number of Runs During Peak Hour** [a]	**Capacity** [b]	**Existing (Year 2012) Load Factor** [c]	**Future (Year 2022) Load Factor** [d]	**Residual Capacity per Run**	**Residual Capacity in Peak Hour**
Metro Bus						
111/311	6	50	0.78	0.86	7	42
115	12	50	0.68	0.75	13	156
117	6	50	0.76	0.84	8	48
232	6	50	0.70	0.77	12	72
Metro Rail						
Green	14	152	0.39	0.43	87	1,218
LADOT Commuter Express						
574	6	49	0.49	0.54	23	138
Santa Monica Big Blue Bus						
3	9	60	0.63	0.69	19	171
R3	9	60	0.62	0.68	19	171
Torrance						
8	7	60	0.83	0.91	5	35
					Total Residual Capacity in Peak Hour	**2,051**

TABLE LAXN-AR02-5
CMP TRANSIT CAPACITY ANALYSIS WITH UPDATED TRANSIT LINES

Afternoon Peak Hour						
Provider and Route	**Number of Runs During Peak Hour** [a]	**Capacity** [b]	**Existing (Year 2012) Load Factor** [c]	**Future (Year 2022) Load Factor** [d]	**Residual Capacity per Run**	**Residual Capacity in Peak Hour**
Metro Bus						
111/311	7	50	0.78	0.86	7	49
115	12	50	0.78	0.86	7	84
117	6	50	0.82	0.90	5	30
232	7	50	0.68	0.75	13	91
Metro Rail						
Green	16	152	0.43	0.47	81	1,296
LADOT Commuter Express						
574	2	49	0.45	0.50	25	50
Santa Monica Big Blue Bus						
3	9	60	0.68	0.75	15	135
R3	8	60	0.48	0.53	28	224
Torrance						
8	8	60	0.63	0.69	19	152
					Total Residual Capacity in Peak Hour	**2,111**

Notes:

Metro: Los Angeles County Metropolitan Transportation Authority.

LADOT: Los Angeles Department of Transportation

[a] Number of runs in both directions combined during peak hour.

[b] Capacity assumptions:

TABLE LAXN-AR02-5
CMP TRANSIT CAPACITY ANALYSIS WITH UPDATED TRANSIT LINES

Metro Regular Bus - 40 seated + 10 standing = 50.

Metro Articulated Bus - 66 seated + 9 standing = 75.

LADOT Commuter Express Bus - 49 seated.

Santa Monica Big Blue Bus - 50 seated + 10 standing = 60.

Torrance Transit - 45 seated + 15 standing = 60

[c] Existing Load Factors from Table 7.

[d] Future Load Factors are Existing Load Factors increased by 10% to reflect 10 years fo transit ridership growth.

TABLE LAXN-AL07-1
EXISTING WITH PROJECT CONDITIONS (YEAR 2012)
CULVER CITY SUPPLMENTAL SIGNIFICANT INTERSECTION IMPACT ANALYSIS

No.	City	Intersection	Peak Hour	Existing		Existing with Project with Mitigation			
				V/C	LOS	V/C	LOS	Δ V/C	Impact
30.	CC	Centinela Avenue & Washington Boulevard	A.M. P.M.	0.866 0.975	D E	0.866 0.977	D E	0.000 0.002	NO NO
43.	CC	Overland Avenue & Culver Boulevard	A.M. P.M.	1.018 0.903	F E	1.020 0.906	F E	0.002 0.003	NO NO
79.	CC	Overland Avenue & Jefferson Boulevard	A.M. P.M.	0.713 0.764	C C	0.716 0.779	C C	0.003 0.015	NO NO
118.	CC	Sawtelle Boulevard & Matteson Street / I-405 SB Ramps	A.M. P.M.	0.995 0.867	E D	1.002 0.871	F D	0.007 0.004	NO NO
134.	CC	Sepulveda Boulevard & I-405 NB Ramps	A.M. P.M.	0.794 0.831	C D	0.806 0.841	D D	0.012 0.010	NO NO
140.	CC	SR-90 Ramps & Slauson Avenue	A.M. P.M.	0.582 0.706	A C	0.591 0.720	A C	0.009 0.014	NO NO
150.	CC	Sepulveda Boulevard & Braddock Drive	A.M. P.M.	0.581 0.639	A B	0.584 0.651	A B	0.003 0.012	NO NO
154.	CC [a]	Overland Avenue & Sawtelle Boulevard	A.M. P.M.	0.613 0.753	B C	0.618 0.766	B C	0.005 0.013	NO NO
155.	CC	Overland Avenue & Washington Boulevard	A.M. P.M.	0.767 0.955	C E	0.773 0.964	C E	0.006 0.009	NO NO
156.	CC [a]	Walgrove Avenue & Washington Boulevard	A.M. P.M.	0.849 1.103	D F	0.853 1.105	D F	0.004 0.002	NO NO
180.	CC	La Cienega Boulevard & Washington Boulevard	A.M. P.M.	0.943 0.873	E D	0.948 0.882	E D	0.005 0.009	NO NO

TABLE LAXN-AL07-1
EXISTING WITH PROJECT CONDITIONS (YEAR 2012)
CULVER CITY SUPPLMENTAL SIGNIFICANT INTERSECTION IMPACT ANALYSIS

No.	City	Intersection	Peak Hour	Existing		Existing with Project with Mitigation			
				V/C	LOS	V/C	LOS	Δ V/C	Impact
181.	CC	Glencoe Avenue (South) & Washington Boulevard	A.M. P.M.	0.957 1.161	E F	0.957 1.164	E F	0.000 0.003	NO NO
182.	CC	Inglewood Boulevard & Washington Boulevard	A.M. P.M.	0.930 0.849	E D	0.931 0.850	E D	0.001 0.001	NO NO

Notes:
CC = Culver City
[a] - Unsignalized intersection.

TABLE LAXN-AL07-2
FUTURE WITH PROJECT CONDITIONS (YEAR 2022)
CULVER CITY SUPPLEMENTAL SIGNIFICANT INTERSECTION IMPACT ANALYSIS

No.	City	Intersection	Peak Hour	Future without Project		Future with Project with Mitigation			
				V/C	LOS	V/C	LOS	Δ V/C	Impact
30.	CC	Centinela Avenue & Washington Boulevard	A.M. P.M.	0.938 1.057	E F	0.939 1.058	E F	0.001 0.001	NO NO
43.	CC	Overland Avenue & Culver Boulevard	A.M. P.M.	1.107 0.978	F E	1.109 0.981	F E	0.002 0.003	NO NO
79.	CC	Overland Avenue & Jefferson Boulevard	A.M. P.M.	0.771 0.823	C D	0.776 0.838	C D	0.005 0.015	NO NO
118.	CC	Sawtelle Boulevard & Matteson Street / I-405 SB Ramps	A.M. P.M.	1.080 0.938	F E	1.087 0.942	F E	0.007 0.004	NO NO
134.	CC	Sepulveda Boulevard & I-405 NB Ramps	A.M. P.M.	0.860 0.898	D D	0.872 0.907	D E	0.012 0.009	NO NO
140.	CC	SR-90 Ramps & Slauson Avenue	A.M. P.M.	0.628 0.760	B C	0.638 0.774	B C	0.010 0.014	NO NO
150.	CC	Sepulveda Boulevard & Braddock Drive	A.M. P.M.	0.628 0.689	B B	0.631 0.701	B C	0.003 0.012	NO NO
154.	CC [a]	Overland Avenue & Sawtelle Boulevard	A.M. P.M.	0.661 0.812	B D	0.666 0.826	B D	0.005 0.014	NO NO
155.	CC	Overland Avenue & Washington Boulevard	A.M. P.M.	0.831 1.034	D F	0.837 1.042	D F	0.006 0.008	NO NO
156.	CC [a]	Walgrove Avenue & Washington Boulevard	A.M. P.M.	0.920 1.196	E F	0.924 1.198	E F	0.004 0.002	NO NO
180.	CC	La Cienega Boulevard & Washington Boulevard	A.M. P.M.	1.023 0.943	F E	1.028 0.952	F E	0.005 0.009	NO NO

TABLE LAXN-AL07-2
FUTURE WITH PROJECT CONDITIONS (YEAR 2022)
CULVER CITY SUPPLEMENTAL SIGNIFICANT INTERSECTION IMPACT ANALYSIS

No.	City	Intersection	Peak Hour	Future without Project		Future with Project with Mitigation			
				V/C	LOS	V/C	LOS	Δ V/C	Impact
181.	CC	Glencoe Avenue (South) & Washington Boulevard	A.M. P.M.	1.036 1.257	F F	1.037 1.261	F F	0.001 0.004	NO NO
182.	CC	Inglewood Boulevard & Washington Boulevard	A.M. P.M.	1.008 0.915	F E	1.009 0.916	F E	0.001 0.001	NO NO

Notes:
CC = Culver City
[a] - Unsignalized intersection.

TABLE LAXN-AL07-3
SEPULVEDA BOULEVARD & JEFFERSON BOULEVARD & PLAYA STREET
INTERSECTION ANALYSIS

No.	Intersection	Peak Hour	Existing / Future without Project		Existing / Future with Project				Existing / Future with Project with Conditions of Approval (Project Design Features)			
			V/C	LOS	V/C	LOS	Δ V/C	Exceeds Alternative Threshold	V/C	LOS	Δ V/C	Exceeds Alternative Threshold
86.	Existing Conditions (Year 2012)	A.M. P.M.	0.695 0.875	B D	0.699 0.891	B D	0.004 0.016	NO NO	0.663 0.842	B D	-0.032 -0.033	NO NO
86.	Future Conditions (Year 2022)	A.M. P.M.	0.771 0.991	C E	0.775 1.007	C F	0.004 0.016	NO **YES**	0.727 0.952	C E	-0.044 -0.039	NO NO

TABLE LAXN-AL07-4
TRANSIT PERSON-TRIPS ON CULVER CITY LOCAL AND RAPID ROUTE 6

	Morning Peak Hour			Afternoon Peak Hour		
	In	**Out**	**Total**	**In**	**Out**	**Total**
[a] **Project Trip Generation**	1,584	425	2,009	758	1,785	2,543
[b] **Entering/Exiting Culver City via Sepulveda Boulevard**	71	19	90	34	80	114
[c] **Person Trips**	99	27	126	48	112	160
[d] **Transit Trips**	7	2	9	4	8	12

[a] Project trip generation estimates are from Table 4.14-8 on pages 4.14-47 and 4.14-48 of the Draft EIR.

[b] A total of 4.5% of Project trips are projected to enter Culver City. See response to comment LAXN-AL07-6.

[c] Vehicle trips were converted to person trips using an average vehicle occupancy (AVO) of 1.40 persons per vehicle, as requested by comment LAXN-AL07-11.

[d] Transit trips were estimated as 7.5% of person-trips, as described in detail in response to comment LAXN-AL07-12.

TABLE LAXN-AL07-5
SUPPLEMENTAL CMP TRANSIT CAPACITY ANALYSIS USING 4% ANNUAL TRANSIT RIDERSHIP GROWTH

Morning Peak Hour						
Provider and Route	**Number of Runs During Peak Hour** [a]	**Capacity** [b]	**Existing (Year 2012) Load Factor** [c]	**Future (Year 2022) Load Factor** [d]	**Residual Capacity per Run**	**Residual Capacity in Peak Hour**
Metro Bus						
111/311	6	50	0.78	1.09	0	0
115	12	50	0.68	0.95	3	36
117	6	50	0.76	1.06	0	0
232	6	50	0.70	0.98	1	6
Metro Rail						
Green	14	152	0.39	0.55	68	952
LADOT Commuter Express						
574	6	49	0.49	0.69	15	90
Santa Monica Big Blue Bus						
3	9	60	0.63	0.88	7	63
R3	9	60	0.62	0.87	8	72
Torrance						
8	7	60	0.83	1.16	0	0
					Total Residual Capacity in Peak Hour	**1,219**

Afternoon Peak Hour						
Provider and Route	**Number of Runs During Peak Hour** [a]	**Capacity** [b]	**Existing (Year 2012) Load Factor** [c]	**Future (Year 2022) Load Factor** [d]	**Residual Capacity per Run**	**Residual Capacity in Peak Hour**
Metro Bus						
111/311	7	50	0.78	1.09	0	0
115	12	50	0.78	1.09	0	0
117	6	50	0.82	1.15	0	0
232	7	50	0.68	0.95	3	21
Metro Rail						
Green	16	152	0.43	0.60	61	976
LADOT Commuter Express						
574	2	49	0.45	0.63	18	36
Santa Monica Big Blue Bus						
3	9	60	0.68	0.95	3	27
R3	8	60	0.48	0.67	20	160
Torrance						
8	8	60	0.63	0.88	7	56
					Total Residual Capacity in Peak Hour	**1,276**

Notes:

Metro: Los Angeles County Metropolitan Transportation Authority.

LADOT: Los Angeles Department of Transportation

[a] Number of runs in both directions combined during peak hour.

[b] Capacity assumptions:

Metro Regular Bus - 40 seated + 10 standing = 50.
Metro Articulated Bus - 66 seated + 9 standing = 75.
LADOT Commuter Express Bus - 49 seated.
Santa Monica Big Blue Bus - 50 seated + 10 standing = 60.
Torrance Transit - 45 seated + 15 standing = 60

[c] Existing Load Factors from Table 7 on page 48 of the traffic study.

[d] Future Load Factors are Existing Load Factors increased by 40% to reflect 10 years of transit ridership growth.

TABLE LAXN-AL07-6
SUPPLEMENTAL CMP TRANSIT IMPACT ANALYSIS USING 4% ANNUAL TRANSIT RIDERSHIP GROWTH

Description	Morning Peak Hour	Afternoon Peak Hour
Future without Project Capacity Surplus [a]	1,219	1,276
Project Transit Trips [b]	211	267
Future with Project Capacity Surplus	1,008	1,009

Notes:
[a] Future transit capacity surplus from Table 27.
[b] Project transit trips from Table 26.

TABLE LAXN-AL07-7
EXISTING WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2012)
REDUCED BUS MITIGATION CREDIT - SIGNIFICANT INTERSECTION IMPACT ANALYSIS

No.	City	Intersection	Peak Hour	Existing without Project		Existing with Project				Existing with Project with Mitigation			
				V/C	LOS	V/C	LOS	Δ V/C	Impact	V/C	LOS	Δ V/C	Impact
12.	LA	Lincoln Boulevard & Manchester Avenue	A.M. P.M.	0.600 0.645	A B	0.652 0.761	B C	0.052 0.116	NO **YES**	0.543 0.689	A B	-0.057 0.044	NO NO
16.	LA	Pershing Drive & Manchester Avenue	A.M. P.M.	0.455 0.381	A A	0.461 0.405	A A	0.006 0.024	NO NO	0.461 0.405	A A	0.006 0.024	NO NO
28.	LA	Sepulveda Boulevard & Manchester Avenue	A.M. P.M.	0.750 0.767	C C	0.780 0.828	C D	0.030 0.061	NO **YES**	0.641 0.758	B C	-0.109 -0.009	NO NO
39.	LA	La Tijera Boulevard & Manchester Avenue	A.M. P.M.	0.455 0.515	A A	0.520 0.596	A A	0.065 0.081	NO NO	0.507 0.584	A A	0.052 0.069	NO NO
46.	LA	Airport Boulevard & Manchester Avenue	A.M. P.M.	0.578 0.806	A D	0.640 0.865	B D	0.062 0.059	NO **YES**	0.599 0.801	A D	0.021 -0.005	NO NO
47.	IW	Aviation Boulevard / Florence Avenue & Manchester Avenue	A.M. P.M.	0.601 0.685	B B	0.661 0.726	B C	0.060 0.041	NO **YES**	0.637 0.705	B C	0.036 0.020	NO NO
49.	IW	La Cienega Boulevard & Manchester Avenue	A.M. P.M.	0.596 0.828	A D	0.601 0.847	B D	0.005 0.019	NO NO	0.584 0.830	A D	-0.012 0.002	NO NO
50.	IW	Ash Avenue / I-405 Northbound Ramps & Manchester Avenue	A.M. P.M.	0.624 0.711	B C	0.648 0.735	B C	0.024 0.024	NO NO	0.631 0.715	B C	0.007 0.004	NO NO
51.	IW	Inglewood Avenue & Manchester Avenue	A.M. P.M.	0.471 0.597	A A	0.498 0.622	A B	0.027 0.025	NO NO	0.477 0.601	A B	0.006 0.004	NO NO
53.	IW	La Brea Avenue & Manchester Avenue	A.M. P.M.	0.689 0.739	B C	0.698 0.751	B C	0.009 0.012	NO NO	0.687 0.741	B C	-0.002 0.002	NO NO
91.	LA	Falmouth Avenue &	A.M.	0.125	A	0.137	A	0.012	NO	0.134	A	0.009	NO

TABLE LAXN-AL07-7
EXISTING WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2012)
REDUCED BUS MITIGATION CREDIT - SIGNIFICANT INTERSECTION IMPACT ANALYSIS

No.	City	Intersection	Peak Hour	Existing without Project		Existing with Project				Existing with Project with Mitigation			
				V/C	LOS	V/C	LOS	Δ V/C	Impact	V/C	LOS	Δ V/C	Impact
		Manchester Avenue	P.M.	0.107	A	0.125	A	0.018	NO	0.122	A	0.015	NO
96.	LA	Emerson Avenue &	A.M.	0.447	A	0.493	A	0.046	NO	0.482	A	0.035	NO
		Manchester Avenue	P.M.	0.380	A	0.416	A	0.036	NO	0.405	A	0.025	NO

Notes:

LA = Los Angeles; CC = Culver City; MB = Manhattan Beach; ES = El Segundo; IW = Inglewood; HT = Hawthorne; LAC = Los Angeles County

TABLE LAXN-AL07-8
FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2022)
REDUCED BUS MITIGATION CREDIT - SIGNIFICANT INTERSECTION IMPACT ANALYSIS

No.	City	Intersection	Peak Hour	Future without Project		Future with Project				Future with Project with Mitigation			
				V/C	LOS	V/C	LOS	Δ V/C	Impact	V/C	LOS	Δ V/C	Impact
12.	LA	Lincoln Boulevard & Manchester Avenue	A.M. P.M.	0.615 0.692	B B	0.725 0.812	C D	0.110 0.120	**YES** **YES**	0.606 0.724	B C	-0.009 0.032	NO NO
16.	LA	Pershing Drive & Manchester Avenue	A.M. P.M.	0.461 0.411	A A	0.467 0.437	A A	0.006 0.026	NO NO	0.467 0.435	A A	0.006 0.024	NO NO
28.	LA	Sepulveda Boulevard & Manchester Avenue	A.M. P.M.	0.768 0.834	C D	0.798 0.896	C D	0.030 0.062	NO **YES**	0.659 0.805	B D	-0.109 -0.029	NO NO
39.	LA	La Tijera Boulevard & Manchester Avenue	A.M. P.M.	0.515 0.553	A A	0.579 0.635	A B	0.064 0.082	NO NO	0.567 0.622	A B	0.052 0.069	NO NO
46.	LA	Airport Boulevard & Manchester Avenue	A.M. P.M.	0.653 0.917	B E	0.715 0.976	C E	0.062 0.059	**YES** **YES**	0.667 0.907	B E	0.014 -0.010	NO NO
47.	IW	Aviation Boulevard / Florence Avenue & Manchester Avenue	A.M. P.M.	0.684 0.836	B D	0.736 0.877	C D	0.052 0.041	**YES** **YES**	0.713 0.855	C D	0.029 0.019	NO NO
49.	IW	La Cienega Boulevard & Manchester Avenue	A.M. P.M.	0.697 0.911	B E	0.702 0.932	C E	0.005 0.021	NO **YES**	0.685 0.914	B E	-0.012 0.003	NO NO
50.	IW	Ash Avenue / I-405 Northbound Ramps & Manchester Avenue	A.M. P.M.	0.677 0.775	B C	0.701 0.799	C C	0.024 0.024	NO NO	0.684 0.778	B C	0.007 0.003	NO NO
51.	IW	Inglewood Avenue & Manchester Avenue	A.M. P.M.	0.546 0.679	A B	0.573 0.704	A C	0.027 0.025	NO NO	0.552 0.683	A B	0.006 0.004	NO NO
53.	IW	La Brea Avenue & Manchester Avenue	A.M. P.M.	0.793 0.870	C D	0.801 0.883	D D	0.008 0.013	NO NO	0.791 0.873	C D	-0.002 0.003	NO NO
91.	LA	Falmouth Avenue &	A.M.	0.146	A	0.159	A	0.013	NO	0.155	A	0.009	NO

TABLE LAXN-AL07-8
FUTURE WITH PROJECT WITH MITIGATION CONDITIONS (YEAR 2022)
REDUCED BUS MITIGATION CREDIT - SIGNIFICANT INTERSECTION IMPACT ANALYSIS

No.	City	Intersection	Peak Hour	Future without Project		Future with Project				Future with Project with Mitigation			
				V/C	LOS	V/C	LOS	Δ V/C	Impact	V/C	LOS	Δ V/C	Impact
		Manchester Avenue	P.M.	0.128	A	0.145	A	0.017	NO	0.142	A	0.014	NO
96.	LA	Emerson Avenue & Manchester Avenue	A.M. P.M.	0.499 0.425	A A	0.545 0.462	A A	0.046 0.037	NO NO	0.534 0.451	A A	0.035 0.026	NO NO

Notes:

LA = Los Angeles; CC = Culver City; MB = Manhattan Beach; ES = El Segundo; IW = Inglewood; HT = Hawthorne; LAC = Los Angeles County

TABLE LAXN-PC21-1
INTERSECTION PEAK HOUR LEVELS OF SERVICE SUMMARY

Analysis Scenario	Peak Hour	Level of Service							
		A	B	C	D	E	F	D or Better	E or F
Existing Conditions (Year 2012)	A.M. P.M.	67 46	24 20	11 20	3 10	2 7	1 5	105 96	3 12
Existing with Project Conditions (Year 2012)	A.M. P.M.	62 42	24 17	15 23	3 13	3 8	1 5	104 95	4 13
Existing with Project with Mitigation Conditions (Year 2012)	A.M. P.M.	65 44	24 18	12 23	3 10	3 9	1 4	104 95	4 13
Future without Project Conditions (Year 2022)	A.M. P.M.	56 37	21 18	18 20	7 13	4 10	2 10	102 88	6 20
Future with Project Conditions (Year 2022)	A.M. P.M.	51 33	21 13	18 24	11 15	4 11	3 12	101 85	7 23
Future with Project with Mitigation Conditions (Year 2022)	A.M. P.M.	51 33	27 16	14 24	9 13	4 11	3 11	101 86	7 22

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Appendix C

LAX NORTHSIDE PLAN UPDATE

Revised Air Quality Technical Report Tables

December 2014

Prepared for:

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Table H.6-1 Construction Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
366650.00	3756750.00	Worker	2.97E-02	1.20E-04
366900.00	3756750.00	Worker	3.43E-02	1.39E-04
367150.00	3756750.00	Worker	3.79E-02	1.53E-04
367400.00	3756750.00	Worker	3.52E-02	1.42E-04
367650.00	3756750.00	Worker	3.42E-02	1.38E-04
367900.00	3756750.00	Worker	3.18E-02	1.29E-04
368150.00	3756750.00	Worker	2.91E-02	1.18E-04
368400.00	3756750.00	Worker	2.61E-02	1.05E-04
368650.00	3756750.00	Worker	2.33E-02	9.40E-05
368900.00	3756750.00	Worker	2.06E-02	8.32E-05
369150.00	3756750.00	Worker	1.83E-02	7.39E-05
366650.00	3757000.00	Worker	3.81E-02	1.54E-04
366900.00	3757000.00	Worker	4.83E-02	1.95E-04
367150.00	3757000.00	Worker	5.19E-02	2.10E-04
367400.00	3757000.00	Worker	5.46E-02	2.21E-04
367650.00	3757000.00	Worker	5.27E-02	2.13E-04
367900.00	3757000.00	Worker	4.85E-02	1.96E-04
368150.00	3757000.00	Worker	4.27E-02	1.72E-04
368400.00	3757000.00	Worker	3.70E-02	1.49E-04
368650.00	3757000.00	Worker	3.20E-02	1.29E-04
368900.00	3757000.00	Worker	2.78E-02	1.12E-04
369150.00	3757000.00	Worker	2.44E-02	9.84E-05
369400.00	3757000.00	Worker	2.15E-02	8.67E-05
369650.00	3757000.00	Worker	1.91E-02	7.72E-05
369900.00	3757000.00	Worker	1.71E-02	6.92E-05
370150.00	3757000.00	Worker	1.51E-02	6.09E-05
370400.00	3757000.00	Worker	1.31E-02	5.30E-05
370650.00	3757000.00	Worker	1.13E-02	4.58E-05
370900.00	3757000.00	Worker	9.70E-03	3.92E-05
371150.00	3757000.00	Worker	8.36E-03	3.38E-05
371400.00	3757000.00	Worker	7.28E-03	2.94E-05
366400.00	3757250.00	Worker	3.52E-02	1.42E-04
366650.00	3757250.00	Worker	5.04E-02	2.04E-04
368900.00	3757250.00	Worker	4.08E-02	1.65E-04
369150.00	3757250.00	Worker	3.49E-02	1.41E-04
369400.00	3757250.00	Worker	3.02E-02	1.22E-04
369650.00	3757250.00	Worker	2.66E-02	1.08E-04
369900.00	3757250.00	Worker	2.37E-02	9.59E-05
370150.00	3757250.00	Worker	2.10E-02	8.50E-05
370400.00	3757250.00	Worker	1.82E-02	7.35E-05
370650.00	3757250.00	Worker	1.53E-02	6.17E-05
370900.00	3757250.00	Worker	1.26E-02	5.07E-05
371150.00	3757250.00	Worker	1.03E-02	4.18E-05
371400.00	3757250.00	Worker	8.62E-03	3.48E-05
371650.00	3757250.00	Worker	7.32E-03	2.96E-05
366400.00	3757500.00	Worker	3.32E-02	1.34E-04
371400.00	3757500.00	Worker	1.05E-02	4.24E-05

Table H.6-1 Construction Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
371650.00	3757500.00	Worker	8.67E-03	3.50E-05
371900.00	3757500.00	Worker	7.46E-03	3.01E-05
366150.00	3757750.00	Worker	1.95E-02	7.87E-05
366400.00	3757750.00	Residential	1.92E-02	1.12E-04
371650.00	3757750.00	Worker	1.08E-02	4.37E-05
371900.00	3757750.00	Worker	9.02E-03	3.64E-05
366150.00	3758000.00	Residential	1.08E-02	6.32E-05
366400.00	3758000.00	Residential	1.42E-02	8.32E-05
371650.00	3758000.00	Worker	1.48E-02	5.99E-05
371900.00	3758000.00	Worker	1.16E-02	4.69E-05
366150.00	3758250.00	Residential	8.83E-03	5.17E-05
366400.00	3758250.00	Residential	1.00E-02	5.87E-05
371400.00	3758250.00	Residential	2.77E-02	1.62E-04
371650.00	3758250.00	Residential	1.64E-02	9.60E-05
366400.00	3758500.00	Residential	9.05E-03	5.31E-05
366650.00	3758500.00	Residential	1.17E-02	6.85E-05
366900.00	3758500.00	Residential	1.44E-02	8.47E-05
367150.00	3758500.00	Residential	1.97E-02	1.15E-04
368400.00	3758500.00	Residential	8.75E-02	5.13E-04
371400.00	3758500.00	Sensitive	4.05E-02	2.37E-04
371400.00	3758500.00	Worker	5.88E-02	2.37E-04
371650.00	3758500.00	Residential	2.49E-02	1.46E-04
366650.00	3758750.00	Residential	8.43E-03	4.94E-05
366900.00	3758750.00	Residential	1.13E-02	6.60E-05
367150.00	3758750.00	Residential	1.37E-02	8.00E-05
367400.00	3758750.00	Residential	1.46E-02	8.57E-05
367650.00	3758750.00	Residential	1.81E-02	1.06E-04
367900.00	3758750.00	Residential	2.28E-02	1.34E-04
368150.00	3758750.00	Residential	3.27E-02	1.92E-04
368400.00	3758750.00	Residential	4.17E-02	2.45E-04
368650.00	3758750.00	Residential	4.72E-02	2.77E-04
368900.00	3758750.00	Worker	7.55E-02	3.05E-04
370400.00	3758750.00	Residential	4.38E-02	2.57E-04
370650.00	3758750.00	Residential	4.26E-02	2.49E-04
370900.00	3758750.00	Residential	4.45E-02	2.61E-04
371150.00	3758750.00	Residential	4.30E-02	2.52E-04
371400.00	3758750.00	Residential	3.58E-02	2.10E-04
371650.00	3758750.00	Residential	2.76E-02	1.62E-04
367150.00	3759000.00	Residential	9.54E-03	5.59E-05
367400.00	3759000.00	Residential	1.03E-02	6.04E-05
367650.00	3759000.00	Residential	1.05E-02	6.15E-05
367900.00	3759000.00	Residential	1.52E-02	8.92E-05
368150.00	3759000.00	Residential	1.84E-02	1.08E-04
368400.00	3759000.00	Residential	2.18E-02	1.28E-04
368650.00	3759000.00	Residential	2.87E-02	1.68E-04
368900.00	3759000.00	Residential	3.14E-02	1.84E-04
370150.00	3759000.00	Residential	3.61E-02	2.12E-04

Table H.6-1 Construction Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
370400.00	3759000.00	Residential	3.35E-02	1.96E-04
370650.00	3759000.00	Residential	3.12E-02	1.83E-04
370900.00	3759000.00	Residential	2.95E-02	1.73E-04
371150.00	3759000.00	Residential	2.85E-02	1.67E-04
371400.00	3759000.00	Residential	2.74E-02	1.60E-04
368650.00	3759250.00	Residential	1.79E-02	1.05E-04
368900.00	3759250.00	Residential	1.94E-02	1.14E-04
369150.00	3759250.00	Residential	2.21E-02	1.29E-04
369400.00	3759250.00	Residential	2.50E-02	1.46E-04
369650.00	3759250.00	Residential	2.58E-02	1.51E-04
369900.00	3759250.00	Residential	2.71E-02	1.59E-04
370150.00	3759250.00	Residential	2.70E-02	1.58E-04
370400.00	3759250.00	Residential	2.61E-02	1.53E-04
370650.00	3759250.00	Residential	2.48E-02	1.45E-04
370900.00	3759250.00	Residential	2.37E-02	1.39E-04
369150.00	3759500.00	Residential	1.57E-02	9.21E-05
369400.00	3759500.00	Residential	1.77E-02	1.04E-04
369650.00	3759500.00	Residential	1.90E-02	1.11E-04
369900.00	3759500.00	Residential	2.01E-02	1.18E-04
370150.00	3759500.00	Residential	2.02E-02	1.18E-04
368678.83	3758367.22	Sensitive	1.24E-01	7.25E-04
368678.83	3758367.22	Worker	1.79E-01	7.25E-04
368542.19	3758597.82	Sensitive	6.31E-02	3.70E-04
368542.19	3758597.82	Worker	9.15E-02	3.70E-04
370162.18	3758702.91	Sensitive	5.13E-02	3.01E-04
370162.18	3758702.91	Worker	7.44E-02	3.01E-04
367587.25	3758653.04	Sensitive	2.10E-02	1.23E-04
367587.25	3758653.04	Worker	3.05E-02	1.23E-04
368280.31	3758500.63	Sensitive	8.37E-02	4.90E-04
368280.31	3758500.63	Worker	1.21E-01	4.90E-04
369256.41	3758155.27	Sensitive	7.66E-01	4.49E-03
369256.41	3758155.27	Worker	1.11E+00	4.49E-03
370190.78	3758848.26	Sensitive	4.27E-02	2.50E-04
370190.78	3758848.26	Worker	6.19E-02	2.50E-04
371160.80	3758237.88	Sensitive	6.03E-02	3.54E-04
371160.80	3758237.88	Worker	8.75E-02	3.54E-04
367700.00	3757100.00	Worker	6.50E-02	2.63E-04
367800.00	3757100.00	Worker	6.31E-02	2.55E-04
366900.00	3757200.00	Worker	7.17E-02	2.90E-04
367000.00	3757200.00	Worker	7.98E-02	3.22E-04
367100.00	3757200.00	Worker	7.29E-02	2.94E-04
367200.00	3757200.00	Worker	7.61E-02	3.07E-04
367300.00	3757200.00	Worker	8.20E-02	3.31E-04
367400.00	3757200.00	Worker	8.76E-02	3.54E-04
367500.00	3757200.00	Worker	8.64E-02	3.49E-04
367600.00	3757200.00	Worker	8.40E-02	3.39E-04
367700.00	3757200.00	Worker	8.41E-02	3.40E-04

Table H.6-1 Construction Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
367800.00	3757200.00	Worker	8.13E-02	3.29E-04
367900.00	3757200.00	Worker	7.72E-02	3.12E-04
368000.00	3757200.00	Worker	7.21E-02	2.91E-04
368100.00	3757200.00	Worker	6.67E-02	2.69E-04
368200.00	3757200.00	Worker	6.13E-02	2.48E-04
368300.00	3757200.00	Worker	5.65E-02	2.28E-04
368400.00	3757200.00	Worker	5.23E-02	2.11E-04
368500.00	3757200.00	Worker	4.86E-02	1.96E-04
368600.00	3757200.00	Worker	4.54E-02	1.83E-04
368700.00	3757200.00	Worker	4.25E-02	1.72E-04
368800.00	3757200.00	Worker	3.99E-02	1.61E-04
366800.00	3757300.00	Worker	7.42E-02	3.00E-04
366900.00	3757300.00	Worker	8.89E-02	3.59E-04
367000.00	3757300.00	Worker	8.50E-02	3.43E-04
367100.00	3757300.00	Worker	9.01E-02	3.64E-04
367200.00	3757300.00	Worker	9.74E-02	3.93E-04
367300.00	3757300.00	Worker	1.06E-01	4.26E-04
367400.00	3757300.00	Worker	1.15E-01	4.65E-04
367500.00	3757300.00	Worker	1.14E-01	4.59E-04
367600.00	3757300.00	Worker	1.11E-01	4.47E-04
367700.00	3757300.00	Worker	1.11E-01	4.50E-04
367800.00	3757300.00	Worker	1.11E-01	4.49E-04
367900.00	3757300.00	Worker	1.05E-01	4.24E-04
368000.00	3757300.00	Worker	9.65E-02	3.90E-04
368100.00	3757300.00	Worker	8.72E-02	3.52E-04
368200.00	3757300.00	Worker	7.82E-02	3.16E-04
368300.00	3757300.00	Worker	7.05E-02	2.85E-04
368400.00	3757300.00	Worker	6.43E-02	2.60E-04
368500.00	3757300.00	Worker	5.92E-02	2.39E-04
368600.00	3757300.00	Worker	5.49E-02	2.22E-04
368700.00	3757300.00	Worker	5.12E-02	2.07E-04
368800.00	3757300.00	Worker	4.79E-02	1.94E-04
368900.00	3757300.00	Worker	4.48E-02	1.81E-04
369000.00	3757300.00	Worker	4.19E-02	1.69E-04
369100.00	3757300.00	Worker	3.93E-02	1.59E-04
369200.00	3757300.00	Worker	3.68E-02	1.49E-04
369300.00	3757300.00	Worker	3.46E-02	1.40E-04
369400.00	3757300.00	Worker	3.26E-02	1.32E-04
369500.00	3757300.00	Worker	3.09E-02	1.25E-04
369600.00	3757300.00	Worker	2.94E-02	1.19E-04
369700.00	3757300.00	Worker	2.80E-02	1.13E-04
370900.00	3757300.00	Worker	1.33E-02	5.39E-05
371000.00	3757300.00	Worker	1.23E-02	4.95E-05
366700.00	3757400.00	Worker	6.68E-02	2.70E-04
366800.00	3757400.00	Worker	8.76E-02	3.54E-04
366900.00	3757400.00	Worker	9.44E-02	3.81E-04
367000.00	3757400.00	Worker	1.06E-01	4.29E-04

Table H.6-1 Construction Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
367100.00	3757400.00	Worker	1.18E-01	4.77E-04
367200.00	3757400.00	Worker	1.31E-01	5.29E-04
367300.00	3757400.00	Worker	1.43E-01	5.78E-04
367400.00	3757400.00	Worker	1.56E-01	6.31E-04
367500.00	3757400.00	Worker	1.58E-01	6.36E-04
367600.00	3757400.00	Worker	1.59E-01	6.40E-04
367700.00	3757400.00	Worker	1.67E-01	6.77E-04
367800.00	3757400.00	Worker	1.67E-01	6.74E-04
367900.00	3757400.00	Worker	1.57E-01	6.33E-04
368000.00	3757400.00	Worker	1.41E-01	5.70E-04
368100.00	3757400.00	Worker	1.23E-01	4.96E-04
368200.00	3757400.00	Worker	1.05E-01	4.26E-04
368300.00	3757400.00	Worker	9.17E-02	3.70E-04
368400.00	3757400.00	Worker	8.18E-02	3.30E-04
368500.00	3757400.00	Worker	7.45E-02	3.01E-04
368600.00	3757400.00	Worker	6.87E-02	2.78E-04
368700.00	3757400.00	Worker	6.39E-02	2.58E-04
368800.00	3757400.00	Worker	5.96E-02	2.41E-04
368900.00	3757400.00	Worker	5.54E-02	2.24E-04
369000.00	3757400.00	Worker	5.14E-02	2.08E-04
369100.00	3757400.00	Worker	4.77E-02	1.93E-04
369200.00	3757400.00	Worker	4.42E-02	1.79E-04
369300.00	3757400.00	Worker	4.11E-02	1.66E-04
369400.00	3757400.00	Worker	3.84E-02	1.55E-04
369500.00	3757400.00	Worker	3.62E-02	1.46E-04
369600.00	3757400.00	Worker	3.44E-02	1.39E-04
369700.00	3757400.00	Worker	3.29E-02	1.33E-04
369800.00	3757400.00	Worker	3.16E-02	1.28E-04
369900.00	3757400.00	Worker	3.05E-02	1.23E-04
370000.00	3757400.00	Worker	2.93E-02	1.19E-04
370100.00	3757400.00	Worker	2.81E-02	1.14E-04
370200.00	3757400.00	Worker	2.68E-02	1.08E-04
370300.00	3757400.00	Worker	2.54E-02	1.02E-04
370400.00	3757400.00	Worker	2.38E-02	9.60E-05
370500.00	3757400.00	Worker	2.20E-02	8.90E-05
370600.00	3757400.00	Worker	2.02E-02	8.18E-05
370700.00	3757400.00	Worker	1.85E-02	7.49E-05
370800.00	3757400.00	Worker	1.68E-02	6.80E-05
370900.00	3757400.00	Worker	1.52E-02	6.16E-05
371000.00	3757400.00	Worker	1.38E-02	5.58E-05
371100.00	3757400.00	Worker	1.26E-02	5.08E-05
371200.00	3757400.00	Worker	1.15E-02	4.63E-05
366600.00	3757500.00	Worker	5.06E-02	2.04E-04
366700.00	3757500.00	Worker	6.91E-02	2.79E-04
366800.00	3757500.00	Worker	8.57E-02	3.46E-04
366900.00	3757500.00	Worker	1.09E-01	4.42E-04
367000.00	3757500.00	Worker	1.40E-01	5.65E-04

Table H.6-1 Construction Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
367100.00	3757500.00	Worker	1.70E-01	6.88E-04
367200.00	3757500.00	Worker	1.98E-01	8.00E-04
367300.00	3757500.00	Worker	2.23E-01	9.01E-04
367400.00	3757500.00	Worker	2.30E-01	9.31E-04
367500.00	3757500.00	Worker	2.40E-01	9.69E-04
367600.00	3757500.00	Worker	2.54E-01	1.03E-03
367700.00	3757500.00	Worker	2.78E-01	1.12E-03
367800.00	3757500.00	Worker	2.98E-01	1.20E-03
367900.00	3757500.00	Worker	2.80E-01	1.13E-03
368000.00	3757500.00	Worker	2.46E-01	9.94E-04
368100.00	3757500.00	Worker	2.00E-01	8.08E-04
368200.00	3757500.00	Worker	1.56E-01	6.32E-04
368300.00	3757500.00	Worker	1.26E-01	5.10E-04
368400.00	3757500.00	Worker	1.09E-01	4.41E-04
368500.00	3757500.00	Worker	9.84E-02	3.97E-04
368600.00	3757500.00	Worker	9.04E-02	3.65E-04
368700.00	3757500.00	Worker	8.36E-02	3.38E-04
368800.00	3757500.00	Worker	7.75E-02	3.13E-04
368900.00	3757500.00	Worker	7.15E-02	2.89E-04
369000.00	3757500.00	Worker	6.57E-02	2.65E-04
369100.00	3757500.00	Worker	6.01E-02	2.43E-04
369200.00	3757500.00	Worker	5.48E-02	2.21E-04
369300.00	3757500.00	Worker	5.00E-02	2.02E-04
369400.00	3757500.00	Worker	4.60E-02	1.86E-04
369500.00	3757500.00	Worker	4.31E-02	1.74E-04
369600.00	3757500.00	Worker	4.08E-02	1.65E-04
369700.00	3757500.00	Worker	3.91E-02	1.58E-04
369800.00	3757500.00	Worker	3.78E-02	1.53E-04
369900.00	3757500.00	Worker	3.68E-02	1.49E-04
370000.00	3757500.00	Worker	3.57E-02	1.44E-04
370100.00	3757500.00	Worker	3.44E-02	1.39E-04
370200.00	3757500.00	Worker	3.30E-02	1.33E-04
370300.00	3757500.00	Worker	3.14E-02	1.27E-04
370400.00	3757500.00	Worker	2.95E-02	1.19E-04
370500.00	3757500.00	Worker	2.72E-02	1.10E-04
370600.00	3757500.00	Worker	2.48E-02	1.00E-04
370700.00	3757500.00	Worker	2.24E-02	9.04E-05
370800.00	3757500.00	Worker	2.00E-02	8.08E-05
370900.00	3757500.00	Worker	1.78E-02	7.18E-05
371000.00	3757500.00	Worker	1.58E-02	6.39E-05
371100.00	3757500.00	Worker	1.42E-02	5.72E-05
371200.00	3757500.00	Worker	1.27E-02	5.14E-05
371300.00	3757500.00	Worker	1.15E-02	4.65E-05
366600.00	3757600.00	Worker	4.72E-02	1.91E-04
366700.00	3757600.00	Worker	6.17E-02	2.49E-04
366800.00	3757600.00	Worker	8.13E-02	3.28E-04
366900.00	3757600.00	Worker	1.20E-01	4.85E-04

Table H.6-1 Construction Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
367000.00	3757600.00	Worker	1.99E-01	8.05E-04
367100.00	3757600.00	Worker	3.42E-01	1.38E-03
367200.00	3757600.00	Worker	4.35E-01	1.76E-03
367300.00	3757600.00	Worker	4.72E-01	1.91E-03
367400.00	3757600.00	Worker	4.74E-01	1.92E-03
367500.00	3757600.00	Worker	5.07E-01	2.05E-03
367600.00	3757600.00	Worker	5.21E-01	2.10E-03
367700.00	3757600.00	Worker	5.58E-01	2.25E-03
367900.00	3757600.00	Worker	9.05E-01	3.65E-03
368000.00	3757600.00	Worker	7.18E-01	2.90E-03
368100.00	3757600.00	Worker	5.41E-01	2.19E-03
368200.00	3757600.00	Worker	3.06E-01	1.24E-03
368300.00	3757600.00	Worker	2.01E-01	8.14E-04
368400.00	3757600.00	Worker	1.62E-01	6.54E-04
368500.00	3757600.00	Worker	1.42E-01	5.72E-04
368600.00	3757600.00	Worker	1.28E-01	5.18E-04
368700.00	3757600.00	Worker	1.18E-01	4.75E-04
368800.00	3757600.00	Worker	1.08E-01	4.36E-04
368900.00	3757600.00	Worker	9.88E-02	3.99E-04
369000.00	3757600.00	Worker	8.98E-02	3.63E-04
369100.00	3757600.00	Worker	8.06E-02	3.26E-04
369200.00	3757600.00	Worker	7.15E-02	2.89E-04
369300.00	3757600.00	Worker	6.31E-02	2.55E-04
369400.00	3757600.00	Worker	5.66E-02	2.29E-04
369500.00	3757600.00	Worker	5.21E-02	2.10E-04
369600.00	3757600.00	Worker	4.90E-02	1.98E-04
369700.00	3757600.00	Worker	4.74E-02	1.91E-04
369800.00	3757600.00	Worker	4.63E-02	1.87E-04
369900.00	3757600.00	Worker	4.54E-02	1.84E-04
370000.00	3757600.00	Worker	4.47E-02	1.80E-04
370100.00	3757600.00	Worker	4.37E-02	1.77E-04
370200.00	3757600.00	Worker	4.23E-02	1.71E-04
370300.00	3757600.00	Worker	4.06E-02	1.64E-04
370400.00	3757600.00	Worker	3.82E-02	1.54E-04
370500.00	3757600.00	Worker	3.52E-02	1.42E-04
370600.00	3757600.00	Worker	3.17E-02	1.28E-04
370700.00	3757600.00	Worker	2.81E-02	1.14E-04
370800.00	3757600.00	Worker	2.46E-02	9.93E-05
370900.00	3757600.00	Worker	2.13E-02	8.60E-05
371000.00	3757600.00	Worker	1.85E-02	7.47E-05
371100.00	3757600.00	Worker	1.62E-02	6.53E-05
371200.00	3757600.00	Worker	1.43E-02	5.76E-05
371300.00	3757600.00	Worker	1.27E-02	5.15E-05
371400.00	3757600.00	Worker	1.15E-02	4.66E-05
366500.00	3757700.00	Residential	2.41E-02	1.41E-04
366600.00	3757700.00	Worker	4.32E-02	1.75E-04
366700.00	3757700.00	Worker	5.41E-02	2.18E-04

Table H.6-1 Construction Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
366800.00	3757700.00	Worker	7.34E-02	2.96E-04
366900.00	3757700.00	Worker	1.11E-01	4.50E-04
367000.00	3757700.00	Worker	2.20E-01	8.90E-04
368800.00	3757700.00	Worker	1.62E-01	6.54E-04
368900.00	3757700.00	Worker	1.50E-01	6.05E-04
369000.00	3757700.00	Worker	1.36E-01	5.50E-04
369100.00	3757700.00	Worker	1.21E-01	4.88E-04
369200.00	3757700.00	Worker	1.03E-01	4.16E-04
369300.00	3757700.00	Worker	8.56E-02	3.46E-04
369400.00	3757700.00	Worker	7.24E-02	2.93E-04
369500.00	3757700.00	Worker	6.51E-02	2.63E-04
369600.00	3757700.00	Worker	6.15E-02	2.48E-04
369700.00	3757700.00	Worker	6.02E-02	2.43E-04
369800.00	3757700.00	Worker	5.89E-02	2.38E-04
369900.00	3757700.00	Worker	5.97E-02	2.41E-04
370000.00	3757700.00	Worker	5.79E-02	2.34E-04
370100.00	3757700.00	Worker	5.75E-02	2.32E-04
370200.00	3757700.00	Worker	5.67E-02	2.29E-04
370300.00	3757700.00	Worker	5.50E-02	2.22E-04
370400.00	3757700.00	Worker	5.23E-02	2.11E-04
370500.00	3757700.00	Worker	4.85E-02	1.96E-04
370600.00	3757700.00	Worker	4.34E-02	1.75E-04
370700.00	3757700.00	Worker	3.68E-02	1.49E-04
370800.00	3757700.00	Worker	3.17E-02	1.28E-04
370900.00	3757700.00	Worker	2.64E-02	1.07E-04
371000.00	3757700.00	Worker	2.22E-02	8.95E-05
371100.00	3757700.00	Worker	1.88E-02	7.60E-05
371200.00	3757700.00	Worker	1.63E-02	6.57E-05
371300.00	3757700.00	Worker	1.43E-02	5.79E-05
371400.00	3757700.00	Worker	1.29E-02	5.19E-05
366500.00	3757800.00	Residential	2.13E-02	1.25E-04
366600.00	3757800.00	Residential	2.53E-02	1.48E-04
366700.00	3757800.00	Residential	3.19E-02	1.87E-04
366800.00	3757800.00	Residential	4.24E-02	2.49E-04
366900.00	3757800.00	Worker	9.03E-02	3.65E-04
369700.00	3757800.00	Worker	7.69E-02	3.11E-04
369800.00	3757800.00	Worker	7.96E-02	3.22E-04
369900.00	3757800.00	Worker	8.04E-02	3.25E-04
370000.00	3757800.00	Worker	8.05E-02	3.25E-04
370100.00	3757800.00	Worker	8.11E-02	3.28E-04
370200.00	3757800.00	Worker	8.18E-02	3.31E-04
370300.00	3757800.00	Worker	8.20E-02	3.31E-04
370400.00	3757800.00	Worker	7.93E-02	3.20E-04
370500.00	3757800.00	Worker	7.38E-02	2.98E-04
370600.00	3757800.00	Worker	6.58E-02	2.66E-04
370700.00	3757800.00	Worker	5.50E-02	2.22E-04
370800.00	3757800.00	Worker	4.46E-02	1.80E-04

Table H.6-1 Construction Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
370900.00	3757800.00	Worker	3.48E-02	1.40E-04
371000.00	3757800.00	Worker	2.75E-02	1.11E-04
371100.00	3757800.00	Worker	2.25E-02	9.09E-05
371200.00	3757800.00	Worker	1.90E-02	7.68E-05
371300.00	3757800.00	Worker	1.65E-02	6.67E-05
371400.00	3757800.00	Worker	1.46E-02	5.90E-05
366500.00	3757900.00	Residential	1.81E-02	1.06E-04
366600.00	3757900.00	Residential	2.10E-02	1.23E-04
366700.00	3757900.00	Residential	2.66E-02	1.56E-04
366800.00	3757900.00	Residential	3.43E-02	2.01E-04
366900.00	3757900.00	Residential	4.76E-02	2.79E-04
367600.00	3757900.00	Sensitive	4.01E-01	2.35E-03
367600.00	3757900.00	Worker	5.82E-01	2.35E-03
367700.00	3757900.00	Sensitive	6.87E-01	4.02E-03
367700.00	3757900.00	Worker	9.96E-01	4.02E-03
370900.00	3757900.00	Worker	5.00E-02	2.02E-04
371000.00	3757900.00	Sensitive	2.50E-02	1.47E-04
371000.00	3757900.00	Worker	3.63E-02	1.47E-04
371100.00	3757900.00	Worker	2.83E-02	1.14E-04
371200.00	3757900.00	Worker	2.32E-02	9.36E-05
371300.00	3757900.00	Worker	1.96E-02	7.93E-05
371400.00	3757900.00	Worker	1.71E-02	6.89E-05
366500.00	3758000.00	Residential	1.52E-02	8.89E-05
366600.00	3758000.00	Residential	1.78E-02	1.04E-04
366700.00	3758000.00	Residential	2.29E-02	1.34E-04
366800.00	3758000.00	Residential	2.78E-02	1.63E-04
366900.00	3758000.00	Residential	3.57E-02	2.09E-04
367000.00	3758000.00	Residential	4.92E-02	2.88E-04
367100.00	3758000.00	Residential	7.36E-02	4.31E-04
367200.00	3758000.00	Residential	1.03E-01	6.02E-04
367300.00	3758000.00	Residential	1.32E-01	7.71E-04
367400.00	3758000.00	Residential	1.76E-01	1.03E-03
367500.00	3758000.00	Sensitive	2.26E-01	1.33E-03
367500.00	3758000.00	Worker	3.28E-01	1.33E-03
367600.00	3758000.00	Sensitive	2.57E-01	1.50E-03
367600.00	3758000.00	Worker	3.72E-01	1.50E-03
367700.00	3758000.00	Sensitive	4.15E-01	2.43E-03
367700.00	3758000.00	Worker	6.01E-01	2.43E-03
368200.00	3758000.00	Residential	9.84E-01	5.77E-03
368300.00	3758000.00	Residential	7.21E-01	4.22E-03
368400.00	3758000.00	Residential	5.69E-01	3.34E-03
368500.00	3758000.00	Residential	5.27E-01	3.09E-03
368600.00	3758000.00	Residential	4.82E-01	2.82E-03
369300.00	3758000.00	~~Worker~~ Residential	~~1.49E+00~~ 1.03E+00	6.03E-03
370800.00	3758000.00	Worker	1.89E-01	7.64E-04
370900.00	3758000.00	Worker	8.76E-02	3.54E-04

Table H.6-1 Construction Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
371000.00	3758000.00	Worker	5.48E-02	2.21E-04
371100.00	3758000.00	Worker	3.92E-02	1.58E-04
371200.00	3758000.00	Residential	2.09E-02	1.23E-04
371300.00	3758000.00	Worker	2.47E-02	9.96E-05
371400.00	3758000.00	Worker	2.07E-02	8.38E-05
366600.00	3758100.00	Residential	1.58E-02	9.26E-05
366700.00	3758100.00	Residential	1.99E-02	1.16E-04
366800.00	3758100.00	Residential	2.32E-02	1.36E-04
366900.00	3758100.00	Residential	2.84E-02	1.67E-04
367000.00	3758100.00	Residential	3.47E-02	2.04E-04
367100.00	3758100.00	Residential	4.38E-02	2.57E-04
367200.00	3758100.00	Residential	5.59E-02	3.28E-04
367300.00	3758100.00	Residential	7.16E-02	4.19E-04
367400.00	3758100.00	Residential	9.61E-02	5.63E-04
367500.00	3758100.00	Residential	1.25E-01	7.32E-04
367600.00	3758100.00	Sensitive	1.70E-01	9.94E-04
367600.00	3758100.00	Worker	2.46E-01	9.94E-04
367700.00	3758100.00	Sensitive	3.10E-01	1.82E-03
367700.00	3758100.00	Worker	4.50E-01	1.82E-03
368000.00	3758100.00	Residential	7.22E-01	4.23E-03
368100.00	3758100.00	Residential	5.62E-01	3.30E-03
368200.00	3758100.00	Residential	4.57E-01	2.68E-03
368300.00	3758100.00	Residential	3.81E-01	2.23E-03
368400.00	3758100.00	Residential	3.27E-01	1.92E-03
368500.00	3758100.00	Residential	3.01E-01	1.76E-03
368600.00	3758100.00	Residential	2.87E-01	1.68E-03
368700.00	3758100.00	Residential	2.98E-01	1.74E-03
368800.00	3758100.00	Residential	4.09E-01	2.40E-03
369300.00	3758100.00	Worker	1.10E+00	4.46E-03
370800.00	3758100.00	Worker	1.04E+00	4.19E-03
370900.00	3758100.00	Worker	2.36E-01	9.54E-04
371000.00	3758100.00	Sensitive	7.24E-02	4.24E-04
371000.00	3758100.00	Worker	1.05E-01	4.24E-04
371100.00	3758100.00	Worker	6.29E-02	2.54E-04
371200.00	3758100.00	Residential	3.03E-02	1.78E-04
371300.00	3758100.00	Residential	2.30E-02	1.35E-04
371400.00	3758100.00	Residential	1.83E-02	1.08E-04
366600.00	3758200.00	Residential	1.52E-02	8.92E-05
366700.00	3758200.00	Residential	1.71E-02	1.00E-04
366800.00	3758200.00	Residential	1.98E-02	1.16E-04
366900.00	3758200.00	Residential	2.33E-02	1.37E-04
367000.00	3758200.00	Residential	2.71E-02	1.59E-04
367100.00	3758200.00	Residential	3.26E-02	1.91E-04
367200.00	3758200.00	Residential	4.01E-02	2.35E-04
367300.00	3758200.00	Residential	4.98E-02	2.92E-04
367400.00	3758200.00	Residential	6.31E-02	3.70E-04
367500.00	3758200.00	Residential	7.98E-02	4.68E-04

Table H.6-1 Construction Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
367600.00	3758200.00	Residential	1.06E-01	6.21E-04
367700.00	3758200.00	Residential	1.95E-01	1.14E-03
367800.00	3758200.00	Worker	7.55E-01	3.05E-03
367900.00	3758200.00	Sensitive	3.64E-01	2.13E-03
367900.00	3758200.00	Worker	5.28E-01	2.13E-03
368000.00	3758200.00	Sensitive	3.17E-01	1.85E-03
368000.00	3758200.00	Worker	4.59E-01	1.85E-03
368100.00	3758200.00	Residential	2.91E-01	1.71E-03
368200.00	3758200.00	Residential	2.77E-01	1.62E-03
368300.00	3758200.00	Residential	2.51E-01	1.47E-03
368400.00	3758200.00	Residential	2.25E-01	1.32E-03
368500.00	3758200.00	Residential	2.12E-01	1.24E-03
368600.00	3758200.00	Residential	2.03E-01	1.19E-03
368700.00	3758200.00	Residential	1.97E-01	1.16E-03
368800.00	3758200.00	Residential	2.05E-01	1.20E-03
368900.00	3758200.00	Residential	2.72E-01	1.59E-03
369000.00	3758200.00	Worker	5.52E-01	2.23E-03
369100.00	3758200.00	Worker	5.90E-01	2.38E-03
369200.00	3758200.00	Worker	7.55E-01	3.05E-03
370300.00	3758200.00	Sensitive	3.57E-01	2.09E-03
370300.00	3758200.00	Worker	5.18E-01	2.09E-03
370800.00	3758200.00	Worker	1.29E+00	5.22E-03
370900.00	3758200.00	Worker	3.98E-01	1.61E-03
371000.00	3758200.00	Worker	1.82E-01	7.37E-04
371100.00	3758200.00	Worker	1.01E-01	4.10E-04
371200.00	3758200.00	Residential	4.49E-02	2.63E-04
371300.00	3758200.00	Residential	3.17E-02	1.86E-04
366700.00	3758300.00	Residential	1.50E-02	8.81E-05
366800.00	3758300.00	Residential	1.73E-02	1.01E-04
366900.00	3758300.00	Residential	1.97E-02	1.15E-04
367000.00	3758300.00	Residential	2.24E-02	1.31E-04
367100.00	3758300.00	Residential	2.61E-02	1.53E-04
367200.00	3758300.00	Residential	3.08E-02	1.81E-04
367300.00	3758300.00	Residential	3.71E-02	2.17E-04
367400.00	3758300.00	Sensitive	4.52E-02	2.65E-04
367400.00	3758300.00	Worker	6.56E-02	2.65E-04
367500.00	3758300.00	Worker	7.96E-02	3.22E-04
367600.00	3758300.00	Residential	6.67E-02	3.91E-04
367700.00	3758300.00	Residential	8.08E-02	4.73E-04
367800.00	3758300.00	Sensitive	1.13E-01	6.65E-04
367800.00	3758300.00	Worker	1.65E-01	6.65E-04
367900.00	3758300.00	Sensitive	1.55E-01	9.09E-04
367900.00	3758300.00	Worker	2.25E-01	9.09E-04
368000.00	3758300.00	Sensitive	1.68E-01	9.87E-04
368000.00	3758300.00	Worker	2.44E-01	9.87E-04
368100.00	3758300.00	Sensitive	1.71E-01	1.00E-03
368100.00	3758300.00	Worker	2.48E-01	1.00E-03

Table H.6-1 Construction Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
368200.00	3758300.00	Residential	1.75E-01	1.03E-03
368300.00	3758300.00	Residential	1.73E-01	1.01E-03
368400.00	3758300.00	Residential	1.62E-01	9.47E-04
368500.00	3758300.00	Residential	1.54E-01	9.04E-04
368600.00	3758300.00	Sensitive	1.52E-01	8.92E-04
368600.00	3758300.00	Worker	2.21E-01	8.92E-04
368700.00	3758300.00	Sensitive	1.47E-01	8.59E-04
368700.00	3758300.00	Worker	2.13E-01	8.59E-04
368800.00	3758300.00	Residential	1.42E-01	8.33E-04
368900.00	3758300.00	Residential	1.56E-01	9.13E-04
369000.00	3758300.00	Worker	2.62E-01	1.06E-03
369100.00	3758300.00	Worker	2.95E-01	1.19E-03
369200.00	3758300.00	Worker	3.35E-01	1.35E-03
369300.00	3758300.00	Worker	4.49E-01	1.81E-03
369800.00	3758300.00	Residential	1.00E-01	5.86E-04
369900.00	3758300.00	Residential	9.33E-02	5.47E-04
370000.00	3758300.00	Residential	9.42E-02	5.52E-04
370100.00	3758300.00	Residential	9.93E-02	5.82E-04
370200.00	3758300.00	Residential	1.11E-01	6.51E-04
370300.00	3758300.00	Residential	1.42E-01	8.34E-04
370400.00	3758300.00	Residential	2.33E-01	1.37E-03
370500.00	3758300.00	Residential	5.12E-01	3.00E-03
370600.00	3758300.00	Residential	6.10E-01	3.57E-03
370700.00	3758300.00	Residential	4.39E-01	2.57E-03
370800.00	3758300.00	Residential	5.04E-01	2.95E-03
370900.00	3758300.00	Worker	3.99E-01	1.61E-03
371000.00	3758300.00	Worker	2.23E-01	8.99E-04
371100.00	3758300.00	Worker	1.34E-01	5.43E-04
371200.00	3758300.00	Sensitive	5.95E-02	3.49E-04
371200.00	3758300.00	Worker	8.64E-02	3.49E-04
366900.00	3758400.00	Residential	1.64E-02	9.58E-05
367000.00	3758400.00	Residential	1.91E-02	1.12E-04
367100.00	3758400.00	Residential	2.17E-02	1.27E-04
367200.00	3758400.00	Residential	2.51E-02	1.47E-04
367300.00	3758400.00	Residential	2.91E-02	1.71E-04
367400.00	3758400.00	Residential	3.38E-02	1.98E-04
367500.00	3758400.00	Worker	5.74E-02	2.32E-04
367600.00	3758400.00	Residential	4.59E-02	2.69E-04
367700.00	3758400.00	Residential	5.15E-02	3.02E-04
367800.00	3758400.00	Sensitive	6.23E-02	3.65E-04
367800.00	3758400.00	Worker	9.03E-02	3.65E-04
367900.00	3758400.00	Sensitive	7.86E-02	4.61E-04
367900.00	3758400.00	Worker	1.14E-01	4.61E-04
368000.00	3758400.00	Sensitive	9.42E-02	5.52E-04
368000.00	3758400.00	Worker	1.37E-01	5.52E-04
368100.00	3758400.00	Sensitive	1.06E-01	6.23E-04
368100.00	3758400.00	Worker	1.54E-01	6.23E-04

Table H.6-1 Construction Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
368200.00	3758400.00	Residential	1.14E-01	6.70E-04
368300.00	3758400.00	Residential	1.20E-01	7.06E-04
368400.00	3758400.00	Residential	1.19E-01	6.99E-04
368500.00	3758400.00	Residential	1.16E-01	6.82E-04
368600.00	3758400.00	Sensitive	1.16E-01	6.79E-04
368600.00	3758400.00	Worker	1.68E-01	6.79E-04
368700.00	3758400.00	Sensitive	1.13E-01	6.60E-04
368700.00	3758400.00	Worker	1.63E-01	6.60E-04
368800.00	3758400.00	Residential	1.11E-01	6.50E-04
368900.00	3758400.00	Worker	1.68E-01	6.78E-04
369000.00	3758400.00	Worker	1.75E-01	7.07E-04
369100.00	3758400.00	Worker	1.86E-01	7.53E-04
369200.00	3758400.00	Worker	2.00E-01	8.08E-04
369300.00	3758400.00	Worker	2.15E-01	8.69E-04
369800.00	3758400.00	Residential	9.44E-02	5.53E-04
369900.00	3758400.00	Residential	8.30E-02	4.87E-04
370000.00	3758400.00	Residential	7.73E-02	4.53E-04
370100.00	3758400.00	Residential	7.49E-02	4.39E-04
370200.00	3758400.00	Residential	8.00E-02	4.69E-04
370300.00	3758400.00	Residential	8.94E-02	5.24E-04
370400.00	3758400.00	Residential	1.07E-01	6.30E-04
370500.00	3758400.00	Residential	1.40E-01	8.19E-04
370600.00	3758400.00	Residential	1.85E-01	1.08E-03
370700.00	3758400.00	Residential	1.97E-01	1.16E-03
370800.00	3758400.00	Residential	1.91E-01	1.12E-03
370900.00	3758400.00	Worker	2.49E-01	1.01E-03
371000.00	3758400.00	Worker	1.91E-01	7.73E-04
371100.00	3758400.00	Worker	1.37E-01	5.53E-04
371200.00	3758400.00	Worker	9.79E-02	3.95E-04
367400.00	3758500.00	Residential	2.65E-02	1.55E-04
367500.00	3758500.00	Worker	4.29E-02	1.73E-04
367600.00	3758500.00	Worker	4.86E-02	1.96E-04
367700.00	3758500.00	Worker	5.22E-02	2.11E-04
367800.00	3758500.00	Worker	6.23E-02	2.52E-04
367900.00	3758500.00	Sensitive	4.91E-02	2.88E-04
367900.00	3758500.00	Worker	7.12E-02	2.88E-04
368000.00	3758500.00	Sensitive	6.00E-02	3.52E-04
368000.00	3758500.00	Worker	8.70E-02	3.52E-04
368100.00	3758500.00	Sensitive	7.02E-02	4.12E-04
368100.00	3758500.00	Worker	1.02E-01	4.12E-04
368200.00	3758500.00	Sensitive	7.84E-02	4.59E-04
368200.00	3758500.00	Worker	1.14E-01	4.59E-04
368600.00	3758500.00	Residential	8.68E-02	5.08E-04
368700.00	3758500.00	Residential	8.72E-02	5.11E-04
368800.00	3758500.00	Worker	1.29E-01	5.19E-04
368900.00	3758500.00	Worker	1.30E-01	5.25E-04
369000.00	3758500.00	Worker	1.32E-01	5.32E-04

Table H.6-1 Construction Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
369100.00	3758500.00	Worker	1.36E-01	5.49E-04
369200.00	3758500.00	Worker	1.38E-01	5.56E-04
369300.00	3758500.00	Worker	1.44E-01	5.82E-04
369800.00	3758500.00	Residential	8.45E-02	4.95E-04
369900.00	3758500.00	Residential	7.59E-02	4.45E-04
370000.00	3758500.00	Residential	6.99E-02	4.10E-04
370100.00	3758500.00	Residential	6.64E-02	3.89E-04
370200.00	3758500.00	Residential	6.55E-02	3.84E-04
370300.00	3758500.00	Residential	6.71E-02	3.93E-04
370400.00	3758500.00	Residential	7.06E-02	4.14E-04
370500.00	3758500.00	Residential	7.85E-02	4.60E-04
370600.00	3758500.00	Residential	9.19E-02	5.38E-04
370700.00	3758500.00	Residential	1.04E-01	6.08E-04
370800.00	3758500.00	Residential	1.09E-01	6.38E-04
370900.00	3758500.00	Worker	1.53E-01	6.18E-04
371000.00	3758500.00	Worker	1.38E-01	5.56E-04
371100.00	3758500.00	Worker	1.16E-01	4.70E-04
371200.00	3758500.00	Worker	9.35E-02	3.78E-04
367500.00	3758600.00	Residential	2.21E-02	1.29E-04
367600.00	3758600.00	Residential	2.43E-02	1.42E-04
367700.00	3758600.00	Sensitive	2.68E-02	1.57E-04
367700.00	3758600.00	Worker	3.89E-02	1.57E-04
367800.00	3758600.00	Worker	4.11E-02	1.66E-04
367900.00	3758600.00	Worker	4.76E-02	1.92E-04
368000.00	3758600.00	Sensitive	4.24E-02	2.48E-04
368000.00	3758600.00	Worker	6.15E-02	2.48E-04
368100.00	3758600.00	Sensitive	4.91E-02	2.87E-04
368100.00	3758600.00	Worker	7.12E-02	2.87E-04
368800.00	3758600.00	Worker	1.02E-01	4.14E-04
368900.00	3758600.00	Worker	1.04E-01	4.19E-04
369000.00	3758600.00	Worker	1.05E-01	4.23E-04
369100.00	3758600.00	Worker	1.06E-01	4.30E-04
369200.00	3758600.00	Worker	1.06E-01	4.28E-04
369300.00	3758600.00	Worker	1.09E-01	4.39E-04
369400.00	3758600.00	Residential	7.75E-02	4.54E-04
369500.00	3758600.00	Residential	7.81E-02	4.58E-04
369600.00	3758600.00	Residential	7.89E-02	4.63E-04
369700.00	3758600.00	Residential	7.65E-02	4.48E-04
369800.00	3758600.00	Residential	7.18E-02	4.21E-04
369900.00	3758600.00	Residential	6.62E-02	3.88E-04
370000.00	3758600.00	Residential	6.19E-02	3.63E-04
370100.00	3758600.00	Residential	5.92E-02	3.47E-04
370200.00	3758600.00	Residential	5.69E-02	3.34E-04
370300.00	3758600.00	Residential	5.56E-02	3.26E-04
370400.00	3758600.00	Residential	5.57E-02	3.26E-04
370500.00	3758600.00	Residential	5.76E-02	3.37E-04
370600.00	3758600.00	Residential	6.14E-02	3.60E-04

Table H.6-1 Construction Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
370700.00	3758600.00	Residential	6.54E-02	3.84E-04
370800.00	3758600.00	Residential	6.91E-02	4.05E-04
370900.00	3758600.00	Residential	7.01E-02	4.11E-04
371000.00	3758600.00	Worker	9.86E-02	3.98E-04
371100.00	3758600.00	Residential	6.29E-02	3.68E-04
367600.00	3758700.00	Residential	1.91E-02	1.12E-04
367700.00	3758700.00	Residential	2.05E-02	1.20E-04
367800.00	3758700.00	Residential	2.20E-02	1.29E-04
369000.00	3758700.00	Residential	5.86E-02	3.43E-04
369100.00	3758700.00	Residential	5.93E-02	3.47E-04
369200.00	3758700.00	Residential	5.75E-02	3.37E-04
369300.00	3758700.00	Residential	5.98E-02	3.51E-04
369400.00	3758700.00	Residential	6.13E-02	3.59E-04
369500.00	3758700.00	Residential	6.27E-02	3.67E-04
369600.00	3758700.00	Residential	6.30E-02	3.69E-04
369700.00	3758700.00	Residential	6.26E-02	3.67E-04
369800.00	3758700.00	Residential	6.05E-02	3.54E-04
369900.00	3758700.00	Residential	5.71E-02	3.34E-04
370000.00	3758700.00	Residential	5.42E-02	3.18E-04
370100.00	3758700.00	Residential	5.22E-02	3.06E-04
370200.00	3758700.00	Sensitive	5.06E-02	2.97E-04
370200.00	3758700.00	Worker	7.34E-02	2.97E-04
370300.00	3758700.00	Residential	4.87E-02	2.85E-04
370400.00	3758700.00	Residential	4.74E-02	2.78E-04
370500.00	3758700.00	Residential	4.61E-02	2.70E-04
370600.00	3758700.00	Residential	4.61E-02	2.70E-04
370700.00	3758700.00	Residential	4.78E-02	2.80E-04
370800.00	3758700.00	Residential	4.98E-02	2.92E-04
370900.00	3758700.00	Residential	5.08E-02	2.98E-04
371000.00	3758700.00	Worker	7.36E-02	2.97E-04
369000.00	3758800.00	Residential	4.81E-02	2.82E-04
369100.00	3758800.00	Residential	4.80E-02	2.81E-04
369200.00	3758800.00	Residential	4.70E-02	2.75E-04
369300.00	3758800.00	Residential	4.81E-02	2.82E-04
369400.00	3758800.00	Residential	5.05E-02	2.96E-04
369500.00	3758800.00	Residential	5.16E-02	3.02E-04
369600.00	3758800.00	Residential	5.22E-02	3.06E-04
369700.00	3758800.00	Residential	5.21E-02	3.06E-04
369800.00	3758800.00	Residential	5.07E-02	2.97E-04
369900.00	3758800.00	Residential	4.90E-02	2.87E-04
370000.00	3758800.00	Residential	4.78E-02	2.80E-04
370100.00	3758800.00	Residential	4.64E-02	2.72E-04
370200.00	3758800.00	Sensitive	4.51E-02	2.64E-04
370200.00	3758800.00	Worker	6.54E-02	2.64E-04
369100.00	3758900.00	Residential	3.97E-02	2.33E-04
369200.00	3758900.00	Residential	3.93E-02	2.30E-04
369300.00	3758900.00	Residential	4.09E-02	2.40E-04

Table H.6-1 Construction Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
369400.00	3758900.00	Residential	4.26E-02	2.49E-04
369500.00	3758900.00	Residential	4.35E-02	2.55E-04
369600.00	3758900.00	Residential	4.41E-02	2.59E-04
369700.00	3758900.00	Residential	4.42E-02	2.59E-04
369800.00	3758900.00	Residential	4.29E-02	2.52E-04
369900.00	3758900.00	Residential	4.26E-02	2.49E-04
370000.00	3758900.00	Residential	4.21E-02	2.47E-04
370100.00	3758900.00	Residential	4.12E-02	2.42E-04
369200.00	3759000.00	Residential	3.33E-02	1.95E-04
369300.00	3759000.00	Residential	3.50E-02	2.05E-04
369400.00	3759000.00	Residential	3.63E-02	2.12E-04
369500.00	3759000.00	Residential	3.72E-02	2.18E-04
369600.00	3759000.00	Residential	3.78E-02	2.22E-04
369700.00	3759000.00	Residential	3.77E-02	2.21E-04
369800.00	3759000.00	Residential	3.72E-02	2.18E-04
369900.00	3759000.00	Residential	3.71E-02	2.18E-04
370000.00	3759000.00	Residential	3.72E-02	2.18E-04
371013.90	3757908.37	Sensitive	2.47E-02	1.45E-04
371013.90	3757908.37	Worker	3.59E-02	1.45E-04
370976.71	3758096.09	Sensitive	8.20E-02	4.80E-04
370976.71	3758096.09	Worker	1.19E-01	4.80E-04
371425.88	3758504.12	Sensitive	3.83E-02	2.24E-04
371425.88	3758504.12	Worker	5.56E-02	2.24E-04
370981.98	3758116.76	Sensitive	9.15E-02	5.36E-04
370981.98	3758116.76	Worker	1.33E-01	5.36E-04
370976.55	3758084.56	Sensitive	7.52E-02	4.41E-04
370976.55	3758084.56	Worker	1.09E-01	4.41E-04
367771.28	3758595.01	Sensitive	2.80E-02	1.64E-04
367771.28	3758595.01	Worker	4.06E-02	1.64E-04
371007.09	3758087.69	Sensitive	6.38E-02	3.74E-04
371007.09	3758087.69	Worker	9.26E-02	3.74E-04
367714.46	3758610.11	Sensitive	2.63E-02	1.54E-04
367714.46	3758610.11	Worker	3.81E-02	1.54E-04
370223.95	3758179.65	Sensitive	2.30E-01	1.35E-03
370223.95	3758179.65	Worker	3.34E-01	1.35E-03
370156.64	3758889.16	Sensitive	4.10E-02	2.40E-04
370156.64	3758889.16	Worker	5.95E-02	2.40E-04
368685.94	3758354.86	Sensitive	1.28E-01	7.47E-04
368685.94	3758354.86	Worker	1.85E-01	7.47E-04
367401.20	3758280.30	Sensitive	4.82E-02	2.82E-04
367401.20	3758280.30	Worker	6.98E-02	2.82E-04
367525.69	3758001.29	Sensitive	2.27E-01	1.33E-03
367525.69	3758001.29	Worker	3.29E-01	1.33E-03
370226.90	3758395.28	Sensitive	8.34E-02	4.89E-04
370226.90	3758395.28	Worker	1.21E-01	4.89E-04
367943.69	3758519.21	Sensitive	4.99E-02	2.92E-04
367943.69	3758519.21	Worker	7.24E-02	2.92E-04

Table H.6-1 Construction Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
368310.17	3758512.74	Sensitive	8.16E-02	4.78E-04
368310.17	3758512.74	Worker	1.18E-01	4.78E-04
369745.33	3758679.58	Sensitive	6.41E-02	3.76E-04
369745.33	3758679.58	Worker	9.30E-02	3.76E-04
370008.61	3758321.05	Sensitive	8.87E-02	5.20E-04
370008.61	3758321.05	Worker	1.29E-01	5.20E-04
370057.54	3758869.94	Sensitive	4.32E-02	2.53E-04
370057.54	3758869.94	Worker	6.26E-02	2.53E-04

Table H.6-2 Construction Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index for Area 1 Peak Day	Acute Hazard Index for Area 2 Peak Day	Acute Hazard Index for Area 3 Peak Day	Acute Hazard Index for Area 4 Peak Day	Acute Hazard Index for Area 11 Peak Day	Acute Hazard Index for Area 12A West Peak Day	Acute Hazard Index for Area 12A East Peak Day	Acute Hazard Index for Area 13 Peak Day	Acute Hazard Index for Project Peak Day	Maximum Acute Hazard Index
369,783	3,757,810	Fenceline	1.72E-04	1.64E-04	1.69E-04	1.02E-04	2.67E-04	1.54E-04	2.03E-04	6.02E-05	1.02E-04	2.67E-04
369,684	3,757,799	Fenceline	1.65E-04	1.79E-04	1.72E-04	1.14E-04	2.58E-04	1.39E-04	2.06E-04	6.86E-05	1.14E-04	2.58E-04
366,650	3,756,750	Worker	8.69E-05	6.02E-05	4.77E-05	9.00E-05	1.05E-04	5.27E-05	4.43E-05	2.21E-05	9.00E-05	1.05E-04
366,900	3,756,750	Worker	1.01E-04	7.02E-05	5.58E-05	1.06E-04	1.23E-04	6.15E-05	5.16E-05	2.59E-05	1.06E-04	1.23E-04
367,150	3,756,750	Worker	1.60E-04	8.74E-05	7.67E-05	1.51E-04	1.91E-04	1.02E-04	6.50E-05	3.89E-05	1.51E-04	1.91E-04
367,400	3,756,750	Worker	1.08E-04	7.68E-05	6.23E-05	1.14E-04	1.35E-04	6.75E-05	5.74E-05	2.93E-05	1.14E-04	1.35E-04
367,650	3,756,750	Worker	1.02E-04	8.11E-05	6.63E-05	1.17E-04	1.38E-04	6.73E-05	6.12E-05	3.08E-05	1.17E-04	1.38E-04
367,900	3,756,750	Worker	1.10E-04	8.72E-05	7.20E-05	1.24E-04	1.49E-04	7.25E-05	6.60E-05	3.34E-05	1.24E-04	1.49E-04
368,150	3,756,750	Worker	1.01E-04	7.50E-05	6.46E-05	9.72E-05	1.29E-04	6.44E-05	5.98E-05	2.93E-05	9.72E-05	1.29E-04
368,400	3,756,750	Worker	1.01E-04	6.62E-05	6.42E-05	9.03E-05	1.33E-04	6.87E-05	5.60E-05	3.19E-05	9.03E-05	1.33E-04
368,650	3,756,750	Worker	1.06E-04	7.26E-05	7.12E-05	9.95E-05	1.47E-04	7.56E-05	6.22E-05	3.54E-05	9.95E-05	1.47E-04
368,900	3,756,750	Worker	1.02E-04	8.34E-05	7.67E-05	1.04E-04	1.49E-04	7.43E-05	7.02E-05	3.46E-05	1.04E-04	1.49E-04
369,150	3,756,750	Worker	8.78E-05	7.87E-05	7.38E-05	8.38E-05	1.32E-04	6.62E-05	6.94E-05	3.16E-05	8.38E-05	1.32E-04
366,400	3,757,000	OpenWater	9.45E-05	6.31E-05	4.99E-05	9.88E-05	1.13E-04	5.72E-05	4.59E-05	2.37E-05	9.88E-05	1.13E-04
366,650	3,757,000	Worker	1.02E-04	6.84E-05	5.41E-05	1.06E-04	1.22E-04	6.16E-05	4.99E-05	2.57E-05	1.06E-04	1.22E-04
366,900	3,757,000	Worker	1.29E-04	8.44E-05	6.68E-05	1.33E-04	1.52E-04	7.69E-05	6.09E-05	3.22E-05	1.33E-04	1.52E-04
367,150	3,757,000	Worker	1.30E-04	8.85E-05	7.04E-05	1.38E-04	1.58E-04	7.90E-05	6.44E-05	3.39E-05	1.38E-04	1.58E-04
367,400	3,757,000	Worker	1.42E-04	9.94E-05	7.92E-05	1.55E-04	1.76E-04	8.76E-05	7.22E-05	3.79E-05	1.55E-04	1.76E-04
367,650	3,757,000	Worker	1.41E-04	1.04E-04	8.56E-05	1.66E-04	1.90E-04	9.33E-05	7.64E-05	4.30E-05	1.66E-04	1.90E-04
367,900	3,757,000	Worker	1.44E-04	1.09E-04	8.90E-05	1.62E-04	1.89E-04	9.24E-05	8.11E-05	4.23E-05	1.62E-04	1.89E-04
368,150	3,757,000	Worker	1.26E-04	9.04E-05	7.90E-05	1.24E-04	1.62E-04	8.08E-05	7.08E-05	3.77E-05	1.24E-04	1.62E-04
368,400	3,757,000	Worker	1.28E-04	8.58E-05	8.23E-05	1.27E-04	1.76E-04	8.91E-05	7.02E-05	4.29E-05	1.27E-04	1.76E-04
368,650	3,757,000	Worker	1.23E-04	1.05E-04	9.34E-05	1.38E-04	1.81E-04	8.77E-05	8.48E-05	4.45E-05	1.38E-04	1.81E-04
368,900	3,757,000	Worker	1.04E-04	9.92E-05	8.90E-05	1.07E-04	1.55E-04	7.49E-05	8.39E-05	3.77E-05	1.07E-04	1.55E-04
369,150	3,757,000	Worker	1.11E-04	9.38E-05	9.02E-05	1.00E-04	1.62E-04	8.09E-05	8.27E-05	3.97E-05	1.00E-04	1.62E-04
369,400	3,757,000	Worker	1.16E-04	7.81E-05	7.59E-05	1.01E-04	1.62E-04	8.90E-05	7.39E-05	3.96E-05	1.01E-04	1.62E-04
369,650	3,757,000	Worker	1.27E-04	7.39E-05	7.87E-05	1.02E-04	1.76E-04	9.97E-05	7.36E-05	3.41E-05	1.02E-04	1.76E-04
369,900	3,757,000	Worker	1.30E-04	6.68E-05	8.02E-05	8.94E-05	1.80E-04	1.03E-04	7.14E-05	3.51E-05	8.94E-05	1.80E-04
370,150	3,757,000	Worker	1.24E-04	5.60E-05	7.05E-05	8.16E-05	1.70E-04	1.01E-04	5.54E-05	3.41E-05	8.16E-05	1.70E-04
370,400	3,757,000	Worker	1.22E-04	5.88E-05	6.81E-05	8.17E-05	1.66E-04	9.92E-05	5.69E-05	2.84E-05	8.17E-05	1.66E-04
370,650	3,757,000	Worker	1.03E-04	6.14E-05	5.72E-05	7.50E-05	1.31E-04	7.30E-05	6.11E-05	2.04E-05	7.50E-05	1.31E-04
370,900	3,757,000	Worker	7.35E-05	5.62E-05	4.62E-05	6.56E-05	9.77E-05	5.39E-05	5.24E-05	1.47E-05	6.56E-05	9.77E-05
371,150	3,757,000	Worker	6.68E-05	5.35E-05	4.53E-05	6.05E-05	9.34E-05	5.29E-05	4.77E-05	1.21E-05	6.05E-05	9.34E-05
371,400	3,757,000	Worker	6.87E-05	4.91E-05	4.44E-05	5.67E-05	9.53E-05	5.41E-05	4.11E-05	1.06E-05	5.67E-05	9.53E-05
366,400	3,757,250	Worker	1.15E-04	7.25E-05	5.81E-05	1.21E-04	1.38E-04	6.99E-05	5.21E-05	2.93E-05	1.21E-04	1.38E-04
366,650	3,757,250	Worker	1.43E-04	8.82E-05	7.03E-05	1.48E-04	1.68E-04	8.54E-05	6.28E-05	3.56E-05	1.48E-04	1.68E-04
368,900	3,757,250	Worker	1.71E-04	1.22E-04	1.20E-04	1.67E-04	2.42E-04	1.21E-04	1.03E-04	6.22E-05	1.67E-04	2.42E-04
369,150	3,757,250	Worker	1.75E-04	1.09E-04	1.21E-04	1.50E-04	2.48E-04	1.28E-04	9.97E-05	6.48E-05	1.50E-04	2.48E-04
369,400	3,757,250	Worker	1.55E-04	9.40E-05	9.72E-05	1.32E-04	2.14E-04	1.18E-04	9.19E-05	5.59E-05	1.32E-04	2.14E-04
369,650	3,757,250	Worker	1.52E-04	9.51E-05	1.03E-04	1.15E-04	2.14E-04	1.19E-04	9.57E-05	4.20E-05	1.15E-04	2.14E-04
369,900	3,757,250	Worker	1.50E-04	1.01E-04	1.04E-04	1.11E-04	2.11E-04	1.20E-04	1.02E-04	4.01E-05	1.11E-04	2.11E-04
370,150	3,757,250	Worker	1.41E-04	8.91E-05	8.90E-05	1.03E-04	1.94E-04	1.13E-04	8.17E-05	3.33E-05	1.03E-04	1.94E-04
370,400	3,757,250	Worker	1.35E-04	8.63E-05	8.27E-05	9.64E-05	1.86E-04	1.12E-04	8.29E-05	2.61E-05	9.64E-05	1.86E-04
370,650	3,757,250	Worker	1.20E-04	8.23E-05	7.20E-05	8.37E-05	1.52E-04	8.30E-05	8.07E-05	1.56E-05	8.37E-05	1.52E-04
370,900	3,757,250	Worker	8.39E-05	6.82E-05	6.03E-05	6.68E-05	1.18E-04	6.61E-05	6.29E-05	1.26E-05	6.68E-05	1.18E-04
371,150	3,757,250	Worker	8.43E-05	5.64E-05	5.65E-05	5.94E-05	1.20E-04	7.01E-05	4.85E-05	1.35E-05	5.94E-05	1.20E-04
371,400	3,757,250	Worker	8.31E-05	4.86E-05	5.05E-05	5.17E-05	1.11E-04	6.28E-05	4.22E-05	1.24E-05	5.17E-05	1.11E-04
371,650	3,757,250	Worker	5.95E-05	4.12E-05	3.94E-05	3.95E-05	7.88E-05	4.20E-05	3.75E-05	1.06E-05	3.95E-05	7.88E-05
366,150	3,757,500	OpenWater	1.11E-04	6.92E-05	5.52E-05	1.17E-04	1.32E-04	6.74E-05	4.95E-05	2.81E-05	1.17E-04	1.32E-04
366,400	3,757,500	Worker	1.39E-04	8.11E-05	6.57E-05	1.44E-04	1.63E-04	8.39E-05	5.76E-05	3.50E-05	1.44E-04	1.63E-04
371,400	3,757,500	Worker	7.74E-05	4.11E-05	4.51E-05	3.77E-05	9.86E-05	5.58E-05	4.72E-05	1.40E-05	3.77E-05	9.86E-05
371,650	3,757,500	Worker	4.44E-05	3.06E-05	3.12E-05	2.54E-05	6.05E-05	3.47E-05	3.60E-05	1.17E-05	2.54E-05	6.05E-05
371,900	3,757,500	Worker	3.89E-05	2.42E-05	2.71E-05	2.13E-05	5.63E-05	3.51E-05	2.90E-05	1.09E-05	2.13E-05	5.63E-05

Table H.6-2 Construction Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index for Area 1 Peak Day	Acute Hazard Index for Area 2 Peak Day	Acute Hazard Index for Area 3 Peak Day	Acute Hazard Index for Area 4 Peak Day	Acute Hazard Index for Area 11 Peak Day	Acute Hazard Index for Area 12A West Peak Day	Acute Hazard Index for Area 12A East Peak Day	Acute Hazard Index for Area 13 Peak Day	Acute Hazard Index for Project Peak Day	Maximum Acute Hazard Index
366,150	3,757,750	Worker	1.14E-04	7.17E-05	5.66E-05	1.20E-04	1.35E-04	6.83E-05	5.10E-05	2.84E-05	1.20E-04	1.35E-04
366,400	3,757,750	Residential	1.64E-04	9.15E-05	7.35E-05	1.63E-04	1.85E-04	9.59E-05	6.43E-05	3.93E-05	1.63E-04	1.85E-04
371,650	3,757,750	Worker	8.02E-05	2.46E-05	3.87E-05	3.09E-05	1.08E-04	7.10E-05	3.18E-05	1.22E-05	3.09E-05	1.08E-04
371,900	3,757,750	Worker	6.90E-05	2.02E-05	3.18E-05	2.69E-05	9.08E-05	5.93E-05	2.50E-05	9.55E-06	2.69E-05	9.08E-05
366,150	3,758,000	Residential	1.09E-04	7.25E-05	5.56E-05	1.14E-04	1.27E-04	6.38E-05	5.17E-05	2.62E-05	1.14E-04	1.27E-04
366,400	3,758,000	Residential	2.27E-04	9.88E-05	9.00E-05	2.07E-04	2.55E-04	1.39E-04	7.03E-05	5.40E-05	2.07E-04	2.55E-04
371,650	3,758,000	Worker	6.70E-05	1.87E-05	2.89E-05	2.79E-05	8.52E-05	5.35E-05	2.09E-05	7.40E-06	2.79E-05	8.52E-05
371,900	3,758,000	Worker	4.11E-05	1.41E-05	1.92E-05	1.99E-05	5.31E-05	3.27E-05	1.49E-05	5.40E-06	1.99E-05	5.31E-05
366,150	3,758,250	Residential	8.07E-05	6.89E-05	4.85E-05	9.45E-05	9.83E-05	4.68E-05	4.84E-05	1.95E-05	9.45E-05	9.83E-05
366,400	3,758,250	Residential	2.85E-04	1.91E-04	1.43E-04	2.86E-04	3.19E-04	1.61E-04	1.36E-04	6.38E-05	2.86E-04	3.19E-04
371,400	3,758,250	Residential	6.27E-05	2.44E-05	3.02E-05	3.19E-05	7.96E-05	4.75E-05	2.62E-05	8.19E-06	3.19E-05	7.96E-05
371,650	3,758,250	Residential	4.00E-05	1.89E-05	2.13E-05	2.34E-05	5.24E-05	3.10E-05	1.93E-05	6.29E-06	2.34E-05	5.24E-05
366,400	3,758,500	Residential	1.60E-04	6.60E-05	6.36E-05	1.35E-04	1.78E-04	9.93E-05	4.94E-05	3.72E-05	1.35E-04	1.78E-04
366,650	3,758,500	Residential	1.01E-04	6.93E-05	5.28E-05	1.01E-04	1.14E-04	5.74E-05	5.05E-05	2.39E-05	1.01E-04	1.14E-04
366,900	3,758,500	Residential	1.39E-04	9.69E-05	7.26E-05	1.47E-04	1.60E-04	7.95E-05	6.89E-05	3.37E-05	1.47E-04	1.60E-04
367,150	3,758,500	Residential	1.22E-04	1.23E-04	8.25E-05	1.55E-04	1.51E-04	6.78E-05	8.62E-05	2.97E-05	1.55E-04	1.55E-04
368,400	3,758,500	Residential	1.99E-04	1.58E-04	1.36E-04	1.97E-04	2.64E-04	1.31E-04	1.20E-04	5.48E-05	1.97E-04	2.64E-04
371,400	3,758,500	Sensitive	2.23E-04	5.31E-05	9.03E-05	7.88E-05	2.77E-04	1.75E-04	6.75E-05	1.87E-05	7.88E-05	2.77E-04
371,650	3,758,500	Residential	7.05E-05	2.54E-05	3.23E-05	3.30E-05	8.73E-05	5.19E-05	2.82E-05	8.14E-06	3.30E-05	8.73E-05
366,650	3,758,750	Residential	1.58E-04	1.18E-04	8.76E-05	1.70E-04	1.93E-04	9.83E-05	8.82E-05	3.86E-05	1.70E-04	1.93E-04
366,900	3,758,750	Residential	9.48E-05	8.46E-05	5.79E-05	1.09E-04	1.13E-04	5.34E-05	6.03E-05	2.20E-05	1.09E-04	1.13E-04
367,150	3,758,750	Residential	8.32E-05	8.81E-05	6.01E-05	1.13E-04	1.13E-04	5.12E-05	6.31E-05	2.30E-05	1.13E-04	1.13E-04
367,400	3,758,750	Residential	1.54E-04	1.59E-04	1.11E-04	2.02E-04	2.12E-04	1.00E-04	1.18E-04	4.24E-05	2.02E-04	2.12E-04
367,650	3,758,750	Residential	1.21E-04	1.11E-04	8.78E-05	1.15E-04	1.56E-04	7.88E-05	8.81E-05	2.84E-05	1.15E-04	1.56E-04
367,900	3,758,750	Residential	1.76E-04	1.15E-04	1.09E-04	1.25E-04	2.11E-04	1.12E-04	9.09E-05	4.29E-05	1.25E-04	2.11E-04
368,150	3,758,750	Residential	1.61E-04	1.02E-04	9.47E-05	1.29E-04	2.00E-04	1.08E-04	8.51E-05	5.03E-05	1.29E-04	2.00E-04
368,400	3,758,750	Residential	1.82E-04	1.35E-04	1.13E-04	1.56E-04	2.20E-04	1.14E-04	1.14E-04	5.24E-05	1.56E-04	2.20E-04
368,650	3,758,750	Residential	1.70E-04	1.46E-04	1.22E-04	1.70E-04	2.29E-04	1.14E-04	1.30E-04	7.14E-05	1.70E-04	2.29E-04
368,900	3,758,750	Worker	1.51E-04	1.15E-04	9.75E-05	1.47E-04	2.00E-04	1.07E-04	1.04E-04	5.32E-05	1.47E-04	2.00E-04
370,400	3,758,750	Residential	1.68E-04	8.72E-05	9.29E-05	1.07E-04	2.19E-04	1.22E-04	9.06E-05	3.58E-05	1.07E-04	2.19E-04
370,650	3,758,750	Residential	1.21E-04	6.82E-05	7.71E-05	7.91E-05	1.72E-04	1.02E-04	7.29E-05	3.08E-05	7.91E-05	1.72E-04
370,900	3,758,750	Residential	1.43E-04	6.57E-05	9.40E-05	7.47E-05	2.27E-04	1.59E-04	8.00E-05	3.47E-05	7.47E-05	2.27E-04
371,150	3,758,750	Residential	2.31E-04	7.18E-05	1.17E-04	9.47E-05	3.26E-04	2.21E-04	9.08E-05	3.32E-05	9.47E-05	3.26E-04
371,400	3,758,750	Residential	2.07E-04	7.12E-05	9.64E-05	8.16E-05	2.60E-04	1.62E-04	9.58E-05	2.10E-05	8.16E-05	2.60E-04
371,650	3,758,750	Residential	1.10E-04	3.56E-05	5.74E-05	4.92E-05	1.59E-04	1.08E-04	4.29E-05	1.71E-05	4.92E-05	1.59E-04
367,150	3,759,000	Residential	1.03E-04	7.27E-05	6.33E-05	1.14E-04	1.44E-04	7.42E-05	5.37E-05	2.72E-05	1.14E-04	1.44E-04
367,400	3,759,000	Residential	1.03E-04	9.17E-05	6.99E-05	1.11E-04	1.36E-04	6.75E-05	6.78E-05	2.71E-05	1.11E-04	1.36E-04
367,650	3,759,000	Residential	1.10E-04	1.07E-04	9.70E-05	9.63E-05	1.54E-04	7.12E-05	8.90E-05	4.38E-05	9.63E-05	1.54E-04
367,900	3,759,000	Residential	9.15E-05	7.66E-05	6.19E-05	7.91E-05	1.11E-04	5.60E-05	6.91E-05	2.89E-05	7.91E-05	1.11E-04
368,150	3,759,000	Residential	1.20E-04	9.49E-05	8.44E-05	9.29E-05	1.43E-04	7.07E-05	8.68E-05	4.56E-05	9.29E-05	1.43E-04
368,400	3,759,000	Residential	1.39E-04	9.92E-05	9.62E-05	1.07E-04	1.79E-04	9.74E-05	9.69E-05	6.31E-05	1.07E-04	1.79E-04
368,650	3,759,000	Residential	1.40E-04	8.90E-05	8.36E-05	1.16E-04	1.80E-04	1.00E-04	7.56E-05	3.92E-05	1.16E-04	1.80E-04
368,900	3,759,000	Residential	1.58E-04	9.76E-05	8.94E-05	1.29E-04	2.07E-04	1.20E-04	9.59E-05	4.65E-05	1.29E-04	2.07E-04
370,150	3,759,000	Residential	1.72E-04	7.43E-05	8.25E-05	1.10E-04	2.12E-04	1.16E-04	6.78E-05	3.40E-05	1.10E-04	2.12E-04
370,400	3,759,000	Residential	1.12E-04	7.29E-05	7.13E-05	1.05E-04	1.60E-04	8.78E-05	6.37E-05	3.42E-05	1.05E-04	1.60E-04
370,650	3,759,000	Residential	1.12E-04	9.30E-05	7.64E-05	1.18E-04	1.57E-04	8.15E-05	9.04E-05	3.37E-05	1.18E-04	1.57E-04
370,900	3,759,000	Residential	1.27E-04	1.11E-04	1.03E-04	1.26E-04	1.99E-04	1.12E-04	1.06E-04	4.92E-05	1.26E-04	1.99E-04
371,150	3,759,000	Residential	1.51E-04	1.04E-04	1.11E-04	1.09E-04	2.28E-04	1.36E-04	1.08E-04	4.60E-05	1.09E-04	2.28E-04
371,400	3,759,000	Residential	1.57E-04	5.44E-05	8.32E-05	7.76E-05	2.26E-04	1.50E-04	5.70E-05	3.13E-05	7.76E-05	2.26E-04
368,650	3,759,250	Residential	1.27E-04	7.72E-05	7.26E-05	9.88E-05	1.66E-04	9.73E-05	7.59E-05	3.95E-05	9.88E-05	1.66E-04
368,900	3,759,250	Residential	1.75E-04	1.05E-04	9.24E-05	1.35E-04	2.14E-04	1.25E-04	9.70E-05	3.29E-05	1.35E-04	2.14E-04
369,150	3,759,250	Residential	1.68E-04	9.50E-05	9.56E-05	1.19E-04	2.19E-04	1.32E-04	9.79E-05	3.27E-05	1.19E-04	2.19E-04
369,400	3,759,250	Residential	1.50E-04	7.99E-05	8.39E-05	1.18E-04	2.10E-04	1.25E-04	7.29E-05	3.30E-05	1.18E-04	2.10E-04

Table H.6-2 Construction Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index for Area 1 Peak Day	Acute Hazard Index for Area 2 Peak Day	Acute Hazard Index for Area 3 Peak Day	Acute Hazard Index for Area 4 Peak Day	Acute Hazard Index for Area 11 Peak Day	Acute Hazard Index for Area 12A West Peak Day	Acute Hazard Index for Area 12A East Peak Day	Acute Hazard Index for Area 13 Peak Day	Acute Hazard Index for Project Peak Day	Maximum Acute Hazard Index
369,650	3,759,250	Residential	1.86E-04	8.10E-05	9.31E-05	1.36E-04	2.51E-04	1.49E-04	6.64E-05	3.72E-05	1.36E-04	2.51E-04
369,900	3,759,250	Residential	1.49E-04	6.21E-05	7.48E-05	9.53E-05	1.94E-04	1.15E-04	5.70E-05	3.19E-05	9.53E-05	1.94E-04
370,150	3,759,250	Residential	1.12E-04	6.02E-05	5.69E-05	7.14E-05	1.27E-04	6.49E-05	5.34E-05	2.41E-05	7.14E-05	1.27E-04
370,400	3,759,250	Residential	8.82E-05	6.27E-05	5.49E-05	8.29E-05	1.16E-04	6.35E-05	5.13E-05	3.34E-05	8.29E-05	1.16E-04
370,650	3,759,250	Residential	1.18E-04	9.69E-05	8.56E-05	1.14E-04	1.61E-04	7.88E-05	8.46E-05	4.45E-05	1.14E-04	1.61E-04
370,900	3,759,250	Residential	1.16E-04	1.08E-04	8.70E-05	1.33E-04	1.67E-04	8.37E-05	9.54E-05	3.35E-05	1.33E-04	1.67E-04
369,150	3,759,500	Residential	1.55E-04	8.15E-05	8.11E-05	1.10E-04	1.96E-04	1.17E-04	7.81E-05	2.82E-05	1.10E-04	1.96E-04
369,400	3,759,500	Residential	1.30E-04	5.62E-05	6.00E-05	8.69E-05	1.59E-04	9.34E-05	4.83E-05	2.36E-05	8.69E-05	1.59E-04
369,650	3,759,500	Residential	1.21E-04	6.39E-05	6.78E-05	1.04E-04	1.74E-04	1.05E-04	4.97E-05	2.72E-05	1.04E-04	1.74E-04
369,900	3,759,500	Residential	1.26E-04	6.29E-05	6.22E-05	1.01E-04	1.61E-04	8.45E-05	5.51E-05	2.53E-05	1.01E-04	1.61E-04
370,150	3,759,500	Residential	8.80E-05	6.62E-05	5.90E-05	9.02E-05	1.18E-04	5.63E-05	5.20E-05	3.31E-05	9.02E-05	1.18E-04
368,679	3,758,367	Sensitive	2.65E-04	2.14E-04	1.95E-04	2.60E-04	3.68E-04	1.82E-04	1.75E-04	9.05E-05	2.60E-04	3.68E-04
368,542	3,758,598	Sensitive	2.86E-04	2.40E-04	2.22E-04	2.55E-04	3.92E-04	1.90E-04	1.90E-04	1.11E-04	2.55E-04	3.92E-04
370,162	3,758,703	Sensitive	1.60E-04	8.84E-05	9.56E-05	1.18E-04	2.26E-04	1.32E-04	8.14E-05	4.20E-05	1.18E-04	2.26E-04
367,587	3,758,653	Sensitive	1.46E-04	1.44E-04	1.03E-04	1.70E-04	1.91E-04	9.32E-05	1.12E-04	3.95E-05	1.70E-04	1.91E-04
368,280	3,758,501	Sensitive	1.69E-04	1.51E-04	1.18E-04	1.82E-04	2.18E-04	1.03E-04	1.12E-04	4.72E-05	1.82E-04	2.18E-04
369,256	3,758,155	Sensitive	2.56E-04	3.12E-04	3.16E-04	2.27E-04	4.21E-04	1.68E-04	2.63E-04	4.54E-04	2.27E-04	4.54E-04
370,191	3,758,848	Sensitive	1.78E-04	8.47E-05	9.65E-05	1.22E-04	2.39E-04	1.35E-04	7.72E-05	3.97E-05	1.22E-04	2.39E-04
371,161	3,758,238	Sensitive	1.20E-04	3.54E-05	5.00E-05	4.86E-05	1.44E-04	8.63E-05	4.16E-05	1.07E-05	4.86E-05	1.44E-04
367,700	3,757,100	Worker	1.55E-04	1.13E-04	9.21E-05	1.80E-04	2.04E-04	1.00E-04	8.27E-05	4.58E-05	1.80E-04	2.04E-04
367,800	3,757,100	Worker	1.62E-04	1.21E-04	9.71E-05	1.87E-04	2.12E-04	1.03E-04	8.82E-05	4.71E-05	1.87E-04	2.12E-04
366,900	3,757,200	Worker	2.23E-04	1.14E-04	9.87E-05	2.15E-04	2.60E-04	1.39E-04	8.19E-05	5.36E-05	2.15E-04	2.60E-04
367,000	3,757,200	Worker	2.50E-04	1.40E-04	1.16E-04	2.48E-04	2.94E-04	1.55E-04	1.03E-04	6.07E-05	2.48E-04	2.94E-04
367,100	3,757,200	Worker	1.55E-04	1.03E-04	8.09E-05	1.66E-04	1.86E-04	9.35E-05	7.35E-05	3.97E-05	1.66E-04	1.86E-04
367,200	3,757,200	Worker	1.58E-04	1.06E-04	8.35E-05	1.71E-04	1.92E-04	9.61E-05	7.57E-05	4.13E-05	1.71E-04	1.92E-04
367,300	3,757,200	Worker	1.76E-04	1.14E-04	9.12E-05	1.89E-04	2.13E-04	1.07E-04	8.13E-05	4.63E-05	1.89E-04	2.13E-04
367,400	3,757,200	Worker	2.59E-04	1.38E-04	1.20E-04	2.56E-04	3.09E-04	1.63E-04	9.88E-05	6.49E-05	2.56E-04	3.09E-04
367,500	3,757,200	Worker	2.29E-04	1.32E-04	1.13E-04	2.38E-04	2.82E-04	1.46E-04	9.48E-05	6.07E-05	2.38E-04	2.82E-04
367,600	3,757,200	Worker	1.70E-04	1.23E-04	9.94E-05	2.01E-04	2.25E-04	1.10E-04	8.86E-05	5.02E-05	2.01E-04	2.25E-04
367,700	3,757,200	Worker	1.82E-04	1.28E-04	1.05E-04	2.12E-04	2.39E-04	1.18E-04	9.25E-05	5.34E-05	2.12E-04	2.39E-04
367,800	3,757,200	Worker	1.87E-04	1.35E-04	1.08E-04	2.16E-04	2.43E-04	1.19E-04	9.73E-05	5.39E-05	2.16E-04	2.43E-04
367,900	3,757,200	Worker	1.86E-04	1.36E-04	1.10E-04	2.16E-04	2.44E-04	1.19E-04	9.89E-05	5.48E-05	2.16E-04	2.44E-04
368,000	3,757,200	Worker	1.79E-04	1.29E-04	1.07E-04	2.04E-04	2.38E-04	1.17E-04	9.50E-05	5.45E-05	2.04E-04	2.38E-04
368,100	3,757,200	Worker	1.63E-04	1.15E-04	1.00E-04	1.79E-04	2.19E-04	1.08E-04	8.71E-05	5.18E-05	1.79E-04	2.19E-04
368,200	3,757,200	Worker	1.52E-04	1.03E-04	9.58E-05	1.65E-04	2.11E-04	1.05E-04	8.10E-05	5.14E-05	1.65E-04	2.11E-04
368,300	3,757,200	Worker	1.48E-04	1.06E-04	9.90E-05	1.66E-04	2.13E-04	1.05E-04	8.36E-05	5.30E-05	1.66E-04	2.13E-04
368,400	3,757,200	Worker	1.49E-04	1.23E-04	1.09E-04	1.79E-04	2.22E-04	1.06E-04	9.51E-05	5.44E-05	1.79E-04	2.22E-04
368,500	3,757,200	Worker	1.50E-04	1.31E-04	1.13E-04	1.80E-04	2.22E-04	1.05E-04	1.01E-04	5.40E-05	1.80E-04	2.22E-04
368,600	3,757,200	Worker	1.41E-04	1.28E-04	1.10E-04	1.61E-04	2.05E-04	9.62E-05	1.01E-04	4.95E-05	1.61E-04	2.05E-04
368,700	3,757,200	Worker	1.37E-04	1.24E-04	1.09E-04	1.46E-04	1.96E-04	9.26E-05	9.96E-05	4.77E-05	1.46E-04	1.96E-04
368,800	3,757,200	Worker	1.45E-04	1.23E-04	1.11E-04	1.49E-04	2.07E-04	9.95E-05	1.00E-04	5.16E-05	1.49E-04	2.07E-04
366,800	3,757,300	Worker	2.45E-04	1.17E-04	1.05E-04	2.37E-04	2.86E-04	1.53E-04	8.35E-05	6.05E-05	2.37E-04	2.86E-04
366,900	3,757,300	Worker	2.79E-04	1.50E-04	1.26E-04	2.78E-04	3.27E-04	1.73E-04	1.10E-04	6.92E-05	2.78E-04	3.27E-04
367,000	3,757,300	Worker	1.81E-04	1.10E-04	8.79E-05	1.88E-04	2.12E-04	1.08E-04	7.76E-05	4.55E-05	1.88E-04	2.12E-04
367,100	3,757,300	Worker	1.77E-04	1.11E-04	8.87E-05	1.88E-04	2.11E-04	1.07E-04	7.91E-05	4.53E-05	1.88E-04	2.11E-04
367,200	3,757,300	Worker	1.82E-04	1.18E-04	9.35E-05	1.97E-04	2.21E-04	1.11E-04	8.35E-05	4.75E-05	1.97E-04	2.21E-04
367,300	3,757,300	Worker	2.03E-04	1.29E-04	1.03E-04	2.19E-04	2.45E-04	1.23E-04	9.12E-05	5.29E-05	2.19E-04	2.45E-04
367,400	3,757,300	Worker	3.09E-04	1.61E-04	1.40E-04	3.10E-04	3.68E-04	1.94E-04	1.16E-04	7.78E-05	3.10E-04	3.68E-04
367,500	3,757,300	Worker	2.40E-04	1.44E-04	1.19E-04	2.59E-04	2.93E-04	1.49E-04	1.02E-04	6.48E-05	2.59E-04	2.93E-04
367,600	3,757,300	Worker	1.97E-04	1.34E-04	1.10E-04	2.30E-04	2.57E-04	1.27E-04	9.57E-05	5.76E-05	2.30E-04	2.57E-04
367,700	3,757,300	Worker	2.04E-04	1.38E-04	1.13E-04	2.35E-04	2.65E-04	1.31E-04	9.90E-05	5.94E-05	2.35E-04	2.65E-04
367,800	3,757,300	Worker	2.19E-04	1.52E-04	1.24E-04	2.56E-04	2.85E-04	1.40E-04	1.09E-04	6.38E-05	2.56E-04	2.85E-04
367,900	3,757,300	Worker	2.21E-04	1.56E-04	1.27E-04	2.57E-04	2.88E-04	1.41E-04	1.12E-04	6.44E-05	2.57E-04	2.88E-04

Table H.6-2 Construction Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index for Area 1 Peak Day	Acute Hazard Index for Area 2 Peak Day	Acute Hazard Index for Area 3 Peak Day	Acute Hazard Index for Area 4 Peak Day	Acute Hazard Index for Area 11 Peak Day	Acute Hazard Index for Area 12A West Peak Day	Acute Hazard Index for Area 12A East Peak Day	Acute Hazard Index for Area 13 Peak Day	Acute Hazard Index for Project Peak Day	Maximum Acute Hazard Index
368,000	3,757,300	Worker	2.10E-04	1.45E-04	1.22E-04	2.42E-04	2.78E-04	1.37E-04	1.06E-04	6.38E-05	2.42E-04	2.78E-04
368,100	3,757,300	Worker	1.89E-04	1.29E-04	1.14E-04	2.15E-04	2.58E-04	1.28E-04	9.62E-05	6.13E-05	2.15E-04	2.58E-04
368,200	3,757,300	Worker	1.76E-04	1.19E-04	1.11E-04	2.02E-04	2.51E-04	1.24E-04	9.13E-05	6.21E-05	2.02E-04	2.51E-04
368,300	3,757,300	Worker	1.76E-04	1.36E-04	1.20E-04	2.14E-04	2.58E-04	1.24E-04	1.03E-04	6.30E-05	2.14E-04	2.58E-04
368,400	3,757,300	Worker	1.78E-04	1.48E-04	1.27E-04	2.17E-04	2.58E-04	1.22E-04	1.12E-04	6.23E-05	2.17E-04	2.58E-04
368,500	3,757,300	Worker	1.66E-04	1.48E-04	1.24E-04	1.94E-04	2.35E-04	1.10E-04	1.13E-04	5.62E-05	1.94E-04	2.35E-04
368,600	3,757,300	Worker	1.70E-04	1.41E-04	1.24E-04	1.88E-04	2.40E-04	1.15E-04	1.10E-04	5.88E-05	1.88E-04	2.40E-04
368,700	3,757,300	Worker	1.81E-04	1.38E-04	1.27E-04	1.93E-04	2.55E-04	1.24E-04	1.10E-04	6.39E-05	1.93E-04	2.55E-04
368,800	3,757,300	Worker	1.87E-04	1.33E-04	1.29E-04	1.90E-04	2.64E-04	1.31E-04	1.08E-04	6.81E-05	1.90E-04	2.64E-04
368,900	3,757,300	Worker	1.91E-04	1.26E-04	1.30E-04	1.83E-04	2.68E-04	1.35E-04	1.06E-04	6.97E-05	1.83E-04	2.68E-04
369,000	3,757,300	Worker	1.87E-04	1.19E-04	1.28E-04	1.71E-04	2.64E-04	1.34E-04	1.04E-04	7.03E-05	1.71E-04	2.64E-04
369,100	3,757,300	Worker	1.84E-04	1.15E-04	1.28E-04	1.59E-04	2.60E-04	1.33E-04	1.03E-04	7.01E-05	1.59E-04	2.60E-04
369,200	3,757,300	Worker	1.78E-04	1.12E-04	1.25E-04	1.48E-04	2.51E-04	1.30E-04	1.04E-04	6.85E-05	1.48E-04	2.51E-04
369,300	3,757,300	Worker	1.63E-04	1.03E-04	1.07E-04	1.40E-04	2.27E-04	1.23E-04	9.78E-05	6.32E-05	1.40E-04	2.27E-04
369,400	3,757,300	Worker	1.54E-04	9.86E-05	1.00E-04	1.31E-04	2.14E-04	1.18E-04	9.64E-05	5.65E-05	1.31E-04	2.14E-04
369,500	3,757,300	Worker	1.52E-04	1.01E-04	1.04E-04	1.23E-04	2.13E-04	1.17E-04	1.01E-04	4.54E-05	1.23E-04	2.13E-04
369,600	3,757,300	Worker	1.53E-04	1.06E-04	1.09E-04	1.20E-04	2.16E-04	1.19E-04	1.05E-04	4.26E-05	1.20E-04	2.16E-04
369,700	3,757,300	Worker	1.54E-04	1.10E-04	1.14E-04	1.17E-04	2.19E-04	1.20E-04	1.08E-04	4.21E-05	1.17E-04	2.19E-04
370,900	3,757,300	Worker	8.63E-05	6.76E-05	6.22E-05	6.52E-05	1.22E-04	6.91E-05	6.23E-05	1.32E-05	6.52E-05	1.22E-04
371,000	3,757,300	Worker	8.49E-05	6.17E-05	6.05E-05	6.17E-05	1.23E-04	7.25E-05	5.48E-05	1.43E-05	6.17E-05	1.23E-04
366,700	3,757,400	Worker	2.30E-04	1.10E-04	9.86E-05	2.37E-04	2.75E-04	1.44E-04	7.76E-05	6.19E-05	2.37E-04	2.75E-04
366,800	3,757,400	Worker	3.10E-04	1.54E-04	1.34E-04	3.09E-04	3.65E-04	1.95E-04	1.11E-04	7.87E-05	3.09E-04	3.65E-04
366,900	3,757,400	Worker	2.40E-04	1.21E-04	1.05E-04	2.47E-04	2.85E-04	1.49E-04	8.51E-05	6.34E-05	2.47E-04	2.85E-04
367,000	3,757,400	Worker	2.14E-04	1.22E-04	1.00E-04	2.23E-04	2.52E-04	1.29E-04	8.59E-05	5.46E-05	2.23E-04	2.52E-04
367,100	3,757,400	Worker	2.12E-04	1.26E-04	1.02E-04	2.24E-04	2.52E-04	1.28E-04	8.83E-05	5.46E-05	2.24E-04	2.52E-04
367,200	3,757,400	Worker	2.21E-04	1.31E-04	1.07E-04	2.36E-04	2.65E-04	1.35E-04	9.20E-05	5.78E-05	2.36E-04	2.65E-04
367,300	3,757,400	Worker	2.45E-04	1.44E-04	1.17E-04	2.60E-04	2.92E-04	1.49E-04	1.01E-04	6.35E-05	2.60E-04	2.92E-04
367,400	3,757,400	Worker	3.52E-04	1.83E-04	1.57E-04	3.58E-04	4.18E-04	2.20E-04	1.29E-04	8.83E-05	3.58E-04	4.18E-04
367,500	3,757,400	Worker	2.43E-04	1.55E-04	1.28E-04	2.86E-04	3.16E-04	1.58E-04	1.09E-04	7.12E-05	2.86E-04	3.16E-04
367,600	3,757,400	Worker	2.43E-04	1.54E-04	1.28E-04	2.83E-04	3.16E-04	1.58E-04	1.09E-04	7.14E-05	2.83E-04	3.16E-04
367,700	3,757,400	Worker	2.65E-04	1.65E-04	1.39E-04	3.08E-04	3.45E-04	1.73E-04	1.17E-04	7.86E-05	3.08E-04	3.45E-04
367,800	3,757,400	Worker	2.71E-04	1.77E-04	1.47E-04	3.21E-04	3.56E-04	1.76E-04	1.25E-04	8.06E-05	3.21E-04	3.56E-04
367,900	3,757,400	Worker	2.67E-04	1.81E-04	1.49E-04	3.16E-04	3.51E-04	1.73E-04	1.28E-04	7.94E-05	3.16E-04	3.51E-04
368,000	3,757,400	Worker	2.44E-04	1.67E-04	1.42E-04	2.96E-04	3.35E-04	1.65E-04	1.20E-04	7.77E-05	2.96E-04	3.35E-04
368,100	3,757,400	Worker	2.17E-04	1.47E-04	1.32E-04	2.66E-04	3.12E-04	1.54E-04	1.09E-04	7.53E-05	2.66E-04	3.12E-04
368,200	3,757,400	Worker	2.18E-04	1.52E-04	1.35E-04	2.63E-04	3.11E-04	1.52E-04	1.13E-04	7.50E-05	2.63E-04	3.11E-04
368,300	3,757,400	Worker	2.22E-04	1.69E-04	1.44E-04	2.70E-04	3.13E-04	1.50E-04	1.25E-04	7.46E-05	2.70E-04	3.13E-04
368,400	3,757,400	Worker	2.16E-04	1.72E-04	1.45E-04	2.56E-04	3.00E-04	1.43E-04	1.28E-04	7.12E-05	2.56E-04	3.00E-04
368,500	3,757,400	Worker	2.22E-04	1.64E-04	1.45E-04	2.51E-04	3.08E-04	1.49E-04	1.25E-04	7.53E-05	2.51E-04	3.08E-04
368,600	3,757,400	Worker	2.30E-04	1.61E-04	1.49E-04	2.53E-04	3.21E-04	1.57E-04	1.24E-04	8.03E-05	2.53E-04	3.21E-04
368,700	3,757,400	Worker	2.26E-04	1.52E-04	1.47E-04	2.38E-04	3.16E-04	1.56E-04	1.21E-04	8.06E-05	2.38E-04	3.16E-04
368,800	3,757,400	Worker	2.20E-04	1.44E-04	1.47E-04	2.19E-04	3.09E-04	1.54E-04	1.18E-04	8.09E-05	2.19E-04	3.09E-04
368,900	3,757,400	Worker	2.09E-04	1.40E-04	1.45E-04	2.00E-04	2.95E-04	1.47E-04	1.17E-04	7.88E-05	2.00E-04	2.95E-04
369,000	3,757,400	Worker	1.95E-04	1.28E-04	1.39E-04	1.74E-04	2.77E-04	1.39E-04	1.12E-04	7.61E-05	1.74E-04	2.77E-04
369,100	3,757,400	Worker	1.86E-04	1.27E-04	1.39E-04	1.57E-04	2.66E-04	1.33E-04	1.14E-04	7.29E-05	1.57E-04	2.66E-04
369,200	3,757,400	Worker	1.75E-04	1.26E-04	1.36E-04	1.44E-04	2.50E-04	1.25E-04	1.16E-04	6.96E-05	1.44E-04	2.50E-04
369,300	3,757,400	Worker	1.56E-04	1.21E-04	1.16E-04	1.38E-04	2.20E-04	1.15E-04	1.14E-04	6.29E-05	1.38E-04	2.20E-04
369,400	3,757,400	Worker	1.50E-04	1.23E-04	1.14E-04	1.33E-04	2.12E-04	1.11E-04	1.16E-04	5.58E-05	1.33E-04	2.12E-04
369,500	3,757,400	Worker	1.48E-04	1.28E-04	1.19E-04	1.28E-04	2.13E-04	1.12E-04	1.23E-04	4.37E-05	1.28E-04	2.13E-04
369,600	3,757,400	Worker	1.53E-04	1.34E-04	1.28E-04	1.25E-04	2.23E-04	1.16E-04	1.28E-04	4.26E-05	1.25E-04	2.23E-04
369,700	3,757,400	Worker	1.51E-04	1.32E-04	1.25E-04	1.21E-04	2.20E-04	1.18E-04	1.27E-04	4.22E-05	1.21E-04	2.20E-04
369,800	3,757,400	Worker	1.49E-04	1.30E-04	1.21E-04	1.18E-04	2.16E-04	1.18E-04	1.28E-04	4.10E-05	1.18E-04	2.16E-04
369,900	3,757,400	Worker	1.47E-04	1.27E-04	1.16E-04	1.15E-04	2.12E-04	1.19E-04	1.27E-04	4.21E-05	1.15E-04	2.12E-04

Table H.6-2 Construction Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index for Area 1 Peak Day	Acute Hazard Index for Area 2 Peak Day	Acute Hazard Index for Area 3 Peak Day	Acute Hazard Index for Area 4 Peak Day	Acute Hazard Index for Area 11 Peak Day	Acute Hazard Index for Area 12A West Peak Day	Acute Hazard Index for Area 12A East Peak Day	Acute Hazard Index for Area 13 Peak Day	Acute Hazard Index for Project Peak Day	Maximum Acute Hazard Index
370,000	3,757,400	Worker	1.48E-04	1.19E-04	1.09E-04	1.12E-04	2.12E-04	1.23E-04	1.17E-04	3.76E-05	1.12E-04	2.12E-04
370,100	3,757,400	Worker	1.46E-04	1.07E-04	1.00E-04	1.09E-04	2.08E-04	1.24E-04	1.01E-04	3.31E-05	1.09E-04	2.08E-04
370,200	3,757,400	Worker	1.46E-04	1.03E-04	9.55E-05	1.05E-04	2.04E-04	1.22E-04	9.75E-05	2.95E-05	1.05E-04	2.04E-04
370,300	3,757,400	Worker	1.52E-04	1.03E-04	9.91E-05	1.03E-04	2.13E-04	1.28E-04	1.01E-04	2.70E-05	1.03E-04	2.13E-04
370,400	3,757,400	Worker	1.56E-04	1.02E-04	1.01E-04	9.90E-05	2.18E-04	1.32E-04	1.05E-04	2.44E-05	9.90E-05	2.18E-04
370,500	3,757,400	Worker	1.52E-04	9.66E-05	9.72E-05	9.31E-05	2.09E-04	1.25E-04	9.89E-05	2.10E-05	9.31E-05	2.09E-04
370,600	3,757,400	Worker	1.42E-04	9.10E-05	8.71E-05	8.49E-05	1.82E-04	1.01E-04	9.32E-05	1.54E-05	8.49E-05	1.82E-04
370,700	3,757,400	Worker	1.41E-04	8.46E-05	8.33E-05	8.02E-05	1.78E-04	9.82E-05	8.62E-05	1.42E-05	8.02E-05	1.78E-04
370,800	3,757,400	Worker	1.22E-04	7.45E-05	7.61E-05	7.18E-05	1.62E-04	9.26E-05	7.30E-05	1.54E-05	7.18E-05	1.62E-04
370,900	3,757,400	Worker	9.45E-05	6.32E-05	6.62E-05	6.16E-05	1.37E-04	8.14E-05	5.81E-05	1.65E-05	6.16E-05	1.37E-04
371,000	3,757,400	Worker	9.57E-05	5.69E-05	6.38E-05	5.88E-05	1.39E-04	8.42E-05	5.08E-05	1.72E-05	5.88E-05	1.39E-04
371,100	3,757,400	Worker	9.52E-05	5.30E-05	5.99E-05	5.54E-05	1.33E-04	7.90E-05	4.80E-05	1.64E-05	5.54E-05	1.33E-04
371,200	3,757,400	Worker	1.01E-04	5.16E-05	5.94E-05	5.39E-05	1.36E-04	7.97E-05	4.93E-05	1.59E-05	5.39E-05	1.36E-04
366,600	3,757,500	Worker	1.93E-04	1.04E-04	8.60E-05	1.96E-04	2.24E-04	1.16E-04	7.26E-05	4.84E-05	1.96E-04	2.24E-04
366,700	3,757,500	Worker	3.17E-04	1.31E-04	1.26E-04	3.09E-04	3.75E-04	2.03E-04	9.27E-05	8.24E-05	3.09E-04	3.75E-04
366,800	3,757,500	Worker	2.80E-04	1.25E-04	1.16E-04	2.87E-04	3.35E-04	1.77E-04	8.72E-05	7.65E-05	2.87E-04	3.35E-04
366,900	3,757,500	Worker	2.64E-04	1.26E-04	1.13E-04	2.72E-04	3.14E-04	1.65E-04	8.82E-05	7.09E-05	2.72E-04	3.14E-04
367,000	3,757,500	Worker	2.57E-04	1.34E-04	1.14E-04	2.68E-04	3.05E-04	1.59E-04	9.29E-05	6.80E-05	2.68E-04	3.05E-04
367,100	3,757,500	Worker	2.62E-04	1.40E-04	1.19E-04	2.78E-04	3.14E-04	1.62E-04	9.76E-05	6.99E-05	2.78E-04	3.14E-04
367,200	3,757,500	Worker	2.82E-04	1.51E-04	1.28E-04	3.02E-04	3.41E-04	1.76E-04	1.05E-04	7.60E-05	3.02E-04	3.41E-04
367,300	3,757,500	Worker	3.62E-04	1.71E-04	1.51E-04	3.68E-04	4.24E-04	2.23E-04	1.19E-04	9.50E-05	3.68E-04	4.24E-04
367,400	3,757,500	Worker	3.98E-04	1.97E-04	1.70E-04	4.10E-04	4.69E-04	2.45E-04	1.36E-04	1.03E-04	4.10E-04	4.69E-04
367,500	3,757,500	Worker	3.08E-04	1.82E-04	1.54E-04	3.60E-04	3.98E-04	2.01E-04	1.26E-04	9.04E-05	3.60E-04	3.98E-04
367,600	3,757,500	Worker	3.25E-04	1.91E-04	1.62E-04	3.81E-04	4.22E-04	2.13E-04	1.33E-04	9.61E-05	3.81E-04	4.22E-04
367,700	3,757,500	Worker	3.69E-04	2.03E-04	1.79E-04	4.30E-04	4.84E-04	2.46E-04	1.41E-04	1.12E-04	4.30E-04	4.84E-04
367,800	3,757,500	Worker	3.56E-04	2.11E-04	1.84E-04	4.36E-04	4.84E-04	2.43E-04	1.47E-04	1.13E-04	4.36E-04	4.84E-04
367,900	3,757,500	Worker	3.40E-04	2.15E-04	1.86E-04	4.29E-04	4.73E-04	2.34E-04	1.51E-04	1.11E-04	4.29E-04	4.73E-04
368,000	3,757,500	Worker	3.10E-04	1.96E-04	1.75E-04	3.92E-04	4.42E-04	2.19E-04	1.40E-04	1.05E-04	3.92E-04	4.42E-04
368,100	3,757,500	Worker	2.95E-04	1.74E-04	1.62E-04	3.50E-04	4.11E-04	2.06E-04	1.27E-04	9.95E-05	3.50E-04	4.11E-04
368,200	3,757,500	Worker	3.10E-04	2.00E-04	1.77E-04	3.75E-04	4.30E-04	2.13E-04	1.44E-04	1.02E-04	3.75E-04	4.30E-04
368,300	3,757,500	Worker	3.19E-04	2.06E-04	1.83E-04	3.84E-04	4.43E-04	2.19E-04	1.49E-04	1.06E-04	3.84E-04	4.43E-04
368,400	3,757,500	Worker	3.11E-04	1.96E-04	1.80E-04	3.64E-04	4.32E-04	2.15E-04	1.45E-04	1.06E-04	3.64E-04	4.32E-04
368,500	3,757,500	Worker	2.94E-04	1.91E-04	1.77E-04	3.36E-04	4.10E-04	2.02E-04	1.43E-04	1.01E-04	3.36E-04	4.10E-04
368,600	3,757,500	Worker	2.67E-04	1.78E-04	1.68E-04	2.94E-04	3.72E-04	1.83E-04	1.36E-04	9.40E-05	2.94E-04	3.72E-04
368,700	3,757,500	Worker	2.39E-04	1.68E-04	1.62E-04	2.53E-04	3.36E-04	1.64E-04	1.33E-04	8.67E-05	2.53E-04	3.36E-04
368,800	3,757,500	Worker	2.18E-04	1.69E-04	1.60E-04	2.24E-04	3.08E-04	1.47E-04	1.35E-04	8.01E-05	2.24E-04	3.08E-04
368,900	3,757,500	Worker	2.01E-04	1.65E-04	1.58E-04	1.97E-04	2.87E-04	1.36E-04	1.35E-04	7.73E-05	1.97E-04	2.87E-04
369,000	3,757,500	Worker	1.85E-04	1.57E-04	1.54E-04	1.72E-04	2.68E-04	1.27E-04	1.32E-04	7.35E-05	1.72E-04	2.68E-04
369,100	3,757,500	Worker	1.79E-04	1.65E-04	1.62E-04	1.61E-04	2.63E-04	1.22E-04	1.41E-04	7.17E-05	1.61E-04	2.63E-04
369,200	3,757,500	Worker	1.69E-04	1.67E-04	1.60E-04	1.53E-04	2.51E-04	1.17E-04	1.46E-04	6.91E-05	1.53E-04	2.51E-04
369,300	3,757,500	Worker	1.47E-04	1.54E-04	1.30E-04	1.45E-04	2.13E-04	1.04E-04	1.38E-04	6.29E-05	1.45E-04	2.13E-04
369,400	3,757,500	Worker	1.46E-04	1.58E-04	1.36E-04	1.38E-04	2.14E-04	1.05E-04	1.44E-04	5.68E-05	1.38E-04	2.14E-04
369,500	3,757,500	Worker	1.51E-04	1.61E-04	1.45E-04	1.33E-04	2.26E-04	1.11E-04	1.49E-04	4.44E-05	1.33E-04	2.26E-04
369,600	3,757,500	Worker	1.51E-04	1.61E-04	1.45E-04	1.29E-04	2.26E-04	1.15E-04	1.53E-04	4.35E-05	1.29E-04	2.26E-04
369,700	3,757,500	Worker	1.47E-04	1.54E-04	1.36E-04	1.24E-04	2.19E-04	1.15E-04	1.49E-04	4.30E-05	1.24E-04	2.19E-04
369,800	3,757,500	Worker	1.47E-04	1.47E-04	1.29E-04	1.21E-04	2.18E-04	1.20E-04	1.46E-04	4.57E-05	1.21E-04	2.18E-04
369,900	3,757,500	Worker	1.48E-04	1.39E-04	1.21E-04	1.18E-04	2.16E-04	1.24E-04	1.42E-04	4.15E-05	1.18E-04	2.16E-04
370,000	3,757,500	Worker	1.48E-04	1.27E-04	1.12E-04	1.13E-04	2.14E-04	1.27E-04	1.28E-04	3.58E-05	1.13E-04	2.14E-04
370,100	3,757,500	Worker	1.56E-04	1.15E-04	1.09E-04	1.10E-04	2.25E-04	1.35E-04	1.11E-04	3.36E-05	1.10E-04	2.25E-04
370,200	3,757,500	Worker	1.62E-04	1.12E-04	1.12E-04	1.06E-04	2.33E-04	1.42E-04	1.12E-04	3.08E-05	1.06E-04	2.33E-04
370,300	3,757,500	Worker	1.69E-04	1.12E-04	1.15E-04	1.02E-04	2.40E-04	1.46E-04	1.18E-04	2.73E-05	1.02E-04	2.40E-04
370,400	3,757,500	Worker	1.73E-04	1.05E-04	1.14E-04	9.79E-05	2.45E-04	1.51E-04	1.12E-04	2.52E-05	9.79E-05	2.45E-04
370,500	3,757,500	Worker	1.70E-04	9.73E-05	1.08E-04	9.15E-05	2.35E-04	1.43E-04	1.04E-04	2.21E-05	9.15E-05	2.35E-04

Table H.6-2 Construction Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index for Area 1 Peak Day	Acute Hazard Index for Area 2 Peak Day	Acute Hazard Index for Area 3 Peak Day	Acute Hazard Index for Area 4 Peak Day	Acute Hazard Index for Area 11 Peak Day	Acute Hazard Index for Area 12A West Peak Day	Acute Hazard Index for Area 12A East Peak Day	Acute Hazard Index for Area 13 Peak Day	Acute Hazard Index for Project Peak Day	Maximum Acute Hazard Index
370,600	3,757,500	Worker	1.59E-04	8.92E-05	9.43E-05	8.29E-05	2.05E-04	1.16E-04	9.53E-05	1.81E-05	8.29E-05	2.05E-04
370,700	3,757,500	Worker	1.64E-04	8.03E-05	9.10E-05	7.99E-05	2.10E-04	1.20E-04	8.43E-05	1.90E-05	7.99E-05	2.10E-04
370,800	3,757,500	Worker	1.37E-04	6.75E-05	8.00E-05	6.97E-05	1.84E-04	1.09E-04	6.73E-05	2.00E-05	6.97E-05	1.84E-04
370,900	3,757,500	Worker	1.09E-04	5.62E-05	6.99E-05	5.95E-05	1.59E-04	9.92E-05	5.31E-05	2.11E-05	5.95E-05	1.59E-04
371,000	3,757,500	Worker	1.10E-04	5.40E-05	6.69E-05	5.63E-05	1.54E-04	9.47E-05	5.41E-05	2.00E-05	5.63E-05	1.54E-04
371,100	3,757,500	Worker	1.13E-04	5.23E-05	6.50E-05	5.42E-05	1.53E-04	9.25E-05	5.54E-05	1.90E-05	5.42E-05	1.53E-04
371,200	3,757,500	Worker	1.12E-04	5.00E-05	6.12E-05	5.10E-05	1.45E-04	8.63E-05	5.52E-05	1.75E-05	5.10E-05	1.45E-04
371,300	3,757,500	Worker	9.04E-05	4.50E-05	5.20E-05	4.32E-05	1.18E-04	6.86E-05	5.06E-05	1.57E-05	4.32E-05	1.18E-04
366,600	3,757,600	Worker	2.11E-04	1.06E-04	9.01E-05	2.09E-04	2.41E-04	1.27E-04	7.47E-05	5.24E-05	2.09E-04	2.41E-04
366,700	3,757,600	Worker	2.91E-04	1.20E-04	1.13E-04	2.84E-04	3.38E-04	1.81E-04	8.42E-05	7.66E-05	2.84E-04	3.38E-04
366,800	3,757,600	Worker	2.84E-04	1.25E-04	1.14E-04	2.79E-04	3.28E-04	1.75E-04	8.75E-05	7.35E-05	2.79E-04	3.28E-04
366,900	3,757,600	Worker	3.22E-04	1.38E-04	1.28E-04	3.23E-04	3.78E-04	2.02E-04	9.60E-05	8.60E-05	3.23E-04	3.78E-04
367,000	3,757,600	Worker	3.45E-04	1.48E-04	1.41E-04	3.62E-04	4.22E-04	2.24E-04	1.03E-04	9.76E-05	3.62E-04	4.22E-04
367,100	3,757,600	Worker	3.80E-04	1.60E-04	1.55E-04	4.01E-04	4.68E-04	2.48E-04	1.11E-04	1.09E-04	4.01E-04	4.68E-04
367,200	3,757,600	Worker	4.44E-04	1.77E-04	1.77E-04	4.68E-04	5.51E-04	2.93E-04	1.23E-04	1.30E-04	4.68E-04	5.51E-04
367,300	3,757,600	Worker	5.91E-04	2.12E-04	2.23E-04	6.12E-04	7.28E-04	3.92E-04	1.45E-04	1.73E-04	6.12E-04	7.28E-04
367,400	3,757,600	Worker	4.94E-04	2.09E-04	2.00E-04	5.21E-04	6.05E-04	3.20E-04	1.44E-04	1.41E-04	5.21E-04	6.05E-04
367,500	3,757,600	Worker	4.58E-04	2.24E-04	2.07E-04	5.32E-04	6.00E-04	3.10E-04	1.53E-04	1.41E-04	5.32E-04	6.00E-04
367,600	3,757,600	Worker	4.77E-04	2.37E-04	2.18E-04	5.55E-04	6.24E-04	3.21E-04	1.63E-04	1.46E-04	5.55E-04	6.24E-04
367,700	3,757,600	Worker	5.14E-04	2.49E-04	2.41E-04	6.25E-04	7.07E-04	3.63E-04	1.71E-04	1.70E-04	6.25E-04	7.07E-04
367,900	3,757,600	Worker	5.93E-04	2.49E-04	2.72E-04	7.33E-04	8.54E-04	4.44E-04	1.74E-04	2.13E-04	7.33E-04	8.54E-04
368,000	3,757,600	Worker	5.32E-04	2.30E-04	2.48E-04	6.45E-04	7.58E-04	3.94E-04	1.63E-04	1.89E-04	6.45E-04	7.58E-04
368,100	3,757,600	Worker	5.01E-04	2.43E-04	2.45E-04	6.10E-04	7.08E-04	3.64E-04	1.71E-04	1.75E-04	6.10E-04	7.08E-04
368,200	3,757,600	Worker	4.78E-04	2.55E-04	2.46E-04	5.91E-04	6.78E-04	3.43E-04	1.80E-04	1.66E-04	5.91E-04	6.78E-04
368,300	3,757,600	Worker	4.13E-04	2.44E-04	2.26E-04	5.08E-04	5.84E-04	2.91E-04	1.74E-04	1.42E-04	5.08E-04	5.84E-04
368,400	3,757,600	Worker	3.35E-04	2.33E-04	2.04E-04	4.12E-04	4.72E-04	2.29E-04	1.69E-04	1.13E-04	4.12E-04	4.72E-04
368,500	3,757,600	Worker	2.71E-04	2.13E-04	1.82E-04	3.26E-04	3.81E-04	1.81E-04	1.57E-04	9.23E-05	3.26E-04	3.81E-04
368,600	3,757,600	Worker	2.32E-04	2.10E-04	1.76E-04	2.74E-04	3.28E-04	1.50E-04	1.57E-04	8.03E-05	2.74E-04	3.28E-04
368,700	3,757,600	Worker	2.05E-04	2.07E-04	1.73E-04	2.36E-04	2.93E-04	1.30E-04	1.57E-04	7.32E-05	2.36E-04	2.93E-04
368,800	3,757,600	Worker	1.88E-04	2.02E-04	1.73E-04	2.06E-04	2.73E-04	1.18E-04	1.57E-04	7.07E-05	2.06E-04	2.73E-04
368,900	3,757,600	Worker	1.81E-04	2.11E-04	1.82E-04	1.94E-04	2.68E-04	1.13E-04	1.67E-04	7.06E-05	1.94E-04	2.68E-04
369,000	3,757,600	Worker	1.76E-04	2.16E-04	1.89E-04	1.83E-04	2.66E-04	1.10E-04	1.73E-04	7.30E-05	1.83E-04	2.66E-04
369,100	3,757,600	Worker	1.73E-04	2.17E-04	1.94E-04	1.71E-04	2.66E-04	1.09E-04	1.78E-04	7.52E-05	1.71E-04	2.66E-04
369,200	3,757,600	Worker	1.66E-04	2.11E-04	1.89E-04	1.61E-04	2.58E-04	1.08E-04	1.76E-04	7.48E-05	1.61E-04	2.58E-04
369,300	3,757,600	Worker	1.44E-04	1.90E-04	1.53E-04	1.54E-04	2.18E-04	9.89E-05	1.67E-04	6.88E-05	1.54E-04	2.18E-04
369,400	3,757,600	Worker	1.58E-04	1.94E-04	1.68E-04	1.50E-04	2.41E-04	1.11E-04	1.75E-04	6.40E-05	1.50E-04	2.41E-04
369,500	3,757,600	Worker	1.64E-04	1.94E-04	1.73E-04	1.44E-04	2.51E-04	1.17E-04	1.80E-04	5.00E-05	1.44E-04	2.51E-04
369,600	3,757,600	Worker	1.53E-04	1.81E-04	1.58E-04	1.37E-04	2.35E-04	1.16E-04	1.75E-04	4.97E-05	1.37E-04	2.35E-04
369,700	3,757,600	Worker	1.51E-04	1.70E-04	1.46E-04	1.32E-04	2.29E-04	1.22E-04	1.70E-04	5.19E-05	1.32E-04	2.29E-04
369,800	3,757,600	Worker	1.47E-04	1.56E-04	1.32E-04	1.26E-04	2.22E-04	1.25E-04	1.60E-04	4.94E-05	1.26E-04	2.22E-04
369,900	3,757,600	Worker	1.55E-04	1.48E-04	1.31E-04	1.21E-04	2.33E-04	1.37E-04	1.58E-04	4.36E-05	1.21E-04	2.33E-04
370,000	3,757,600	Worker	1.66E-04	1.35E-04	1.30E-04	1.15E-04	2.47E-04	1.47E-04	1.42E-04	4.07E-05	1.15E-04	2.47E-04
370,100	3,757,600	Worker	1.78E-04	1.22E-04	1.30E-04	1.10E-04	2.65E-04	1.63E-04	1.25E-04	3.73E-05	1.10E-04	2.65E-04
370,200	3,757,600	Worker	1.89E-04	1.21E-04	1.34E-04	1.06E-04	2.77E-04	1.72E-04	1.34E-04	3.33E-05	1.06E-04	2.77E-04
370,300	3,757,600	Worker	1.94E-04	1.13E-04	1.31E-04	1.01E-04	2.80E-04	1.75E-04	1.28E-04	2.95E-05	1.01E-04	2.80E-04
370,400	3,757,600	Worker	2.07E-04	1.04E-04	1.29E-04	9.80E-05	2.91E-04	1.83E-04	1.20E-04	2.99E-05	9.80E-05	2.91E-04
370,500	3,757,600	Worker	2.04E-04	9.38E-05	1.19E-04	9.16E-05	2.78E-04	1.73E-04	1.07E-04	2.85E-05	9.16E-05	2.78E-04
370,600	3,757,600	Worker	1.84E-04	8.12E-05	9.91E-05	8.07E-05	2.34E-04	1.37E-04	9.07E-05	2.35E-05	8.07E-05	2.34E-04
370,700	3,757,600	Worker	1.95E-04	7.18E-05	9.71E-05	7.99E-05	2.48E-04	1.48E-04	7.83E-05	2.45E-05	7.99E-05	2.48E-04
370,800	3,757,600	Worker	1.60E-04	6.24E-05	8.69E-05	6.83E-05	2.17E-04	1.36E-04	6.88E-05	2.56E-05	6.83E-05	2.17E-04
370,900	3,757,600	Worker	1.25E-04	5.51E-05	7.44E-05	5.66E-05	1.77E-04	1.13E-04	6.25E-05	2.43E-05	5.66E-05	1.77E-04
371,000	3,757,600	Worker	1.27E-04	5.34E-05	7.12E-05	5.43E-05	1.72E-04	1.08E-04	6.34E-05	2.23E-05	5.43E-05	1.72E-04
371,100	3,757,600	Worker	1.34E-04	5.22E-05	6.88E-05	5.34E-05	1.72E-04	1.04E-04	6.45E-05	2.00E-05	5.34E-05	1.72E-04

Table H.6-2 Construction Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index for Area 1 Peak Day	Acute Hazard Index for Area 2 Peak Day	Acute Hazard Index for Area 3 Peak Day	Acute Hazard Index for Area 4 Peak Day	Acute Hazard Index for Area 11 Peak Day	Acute Hazard Index for Area 12A West Peak Day	Acute Hazard Index for Area 12A East Peak Day	Acute Hazard Index for Area 13 Peak Day	Acute Hazard Index for Project Peak Day	Maximum Acute Hazard Index
371,200	3,757,600	Worker	1.07E-04	4.60E-05	5.69E-05	4.42E-05	1.36E-04	8.11E-05	5.77E-05	1.73E-05	4.42E-05	1.36E-04
371,300	3,757,600	Worker	8.95E-05	4.12E-05	4.80E-05	3.78E-05	1.11E-04	6.43E-05	5.23E-05	1.49E-05	3.78E-05	1.11E-04
371,400	3,757,600	Worker	7.04E-05	3.58E-05	4.02E-05	3.15E-05	8.89E-05	5.17E-05	4.56E-05	1.35E-05	3.15E-05	8.89E-05
366,500	3,757,700	Residential	1.99E-04	1.02E-04	8.51E-05	1.96E-04	2.25E-04	1.18E-04	7.13E-05	4.84E-05	1.96E-04	2.25E-04
366,600	3,757,700	Worker	3.70E-04	1.32E-04	1.33E-04	3.39E-04	4.20E-04	2.32E-04	9.35E-05	9.27E-05	3.39E-04	4.20E-04
366,700	3,757,700	Worker	2.88E-04	1.20E-04	1.09E-04	2.66E-04	3.16E-04	1.71E-04	8.39E-05	6.93E-05	2.66E-04	3.16E-04
366,800	3,757,700	Worker	3.35E-04	1.30E-04	1.22E-04	3.05E-04	3.67E-04	2.00E-04	9.03E-05	8.18E-05	3.05E-04	3.67E-04
366,900	3,757,700	Worker	3.99E-04	1.40E-04	1.41E-04	3.68E-04	4.48E-04	2.46E-04	9.77E-05	1.03E-04	3.68E-04	4.48E-04
367,000	3,757,700	Worker	4.75E-04	1.54E-04	1.72E-04	4.75E-04	5.79E-04	3.16E-04	1.08E-04	1.38E-04	4.75E-04	5.79E-04
368,800	3,757,700	Worker	1.72E-04	2.69E-04	2.00E-04	2.35E-04	2.64E-04	9.82E-05	2.00E-04	6.37E-05	2.35E-04	2.69E-04
368,900	3,757,700	Worker	1.80E-04	2.78E-04	2.19E-04	2.31E-04	2.83E-04	1.05E-04	2.11E-04	7.27E-05	2.31E-04	2.83E-04
369,000	3,757,700	Worker	1.86E-04	2.76E-04	2.31E-04	2.17E-04	2.97E-04	1.12E-04	2.14E-04	8.08E-05	2.17E-04	2.97E-04
369,100	3,757,700	Worker	1.90E-04	2.68E-04	2.38E-04	2.00E-04	3.06E-04	1.18E-04	2.14E-04	8.80E-05	2.00E-04	3.06E-04
369,200	3,757,700	Worker	1.85E-04	2.54E-04	2.29E-04	1.86E-04	2.98E-04	1.18E-04	2.10E-04	9.18E-05	1.86E-04	2.98E-04
369,300	3,757,700	Worker	1.64E-04	2.29E-04	1.94E-04	1.74E-04	2.60E-04	1.10E-04	1.98E-04	8.75E-05	1.74E-04	2.60E-04
369,400	3,757,700	Worker	1.76E-04	2.31E-04	2.11E-04	1.63E-04	2.82E-04	1.22E-04	2.07E-04	7.95E-05	1.63E-04	2.82E-04
369,500	3,757,700	Worker	1.86E-04	2.16E-04	1.96E-04	1.58E-04	2.86E-04	1.37E-04	2.06E-04	5.97E-05	1.58E-04	2.86E-04
369,600	3,757,700	Worker	1.78E-04	1.96E-04	1.72E-04	1.48E-04	2.68E-04	1.39E-04	1.99E-04	6.02E-05	1.48E-04	2.68E-04
369,700	3,757,700	Worker	1.75E-04	1.79E-04	1.56E-04	1.37E-04	2.57E-04	1.42E-04	1.93E-04	6.22E-05	1.37E-04	2.57E-04
369,800	3,757,700	Worker	1.71E-04	1.67E-04	1.54E-04	1.24E-04	2.57E-04	1.45E-04	1.85E-04	5.41E-05	1.24E-04	2.57E-04
369,900	3,757,700	Worker	2.01E-04	1.60E-04	1.63E-04	1.21E-04	2.97E-04	1.76E-04	1.85E-04	5.09E-05	1.21E-04	2.97E-04
370,000	3,757,700	Worker	1.85E-04	1.37E-04	1.49E-04	1.08E-04	2.82E-04	1.74E-04	1.56E-04	4.40E-05	1.08E-04	2.82E-04
370,100	3,757,700	Worker	1.99E-04	1.28E-04	1.49E-04	1.03E-04	3.00E-04	1.89E-04	1.51E-04	3.86E-05	1.03E-04	3.00E-04
370,200	3,757,700	Worker	2.12E-04	1.20E-04	1.48E-04	1.00E-04	3.14E-04	2.02E-04	1.48E-04	3.78E-05	1.00E-04	3.14E-04
370,300	3,757,700	Worker	2.26E-04	1.09E-04	1.44E-04	9.78E-05	3.25E-04	2.11E-04	1.36E-04	3.86E-05	9.78E-05	3.25E-04
370,400	3,757,700	Worker	2.40E-04	9.74E-05	1.39E-04	9.65E-05	3.39E-04	2.22E-04	1.22E-04	3.92E-05	9.65E-05	3.39E-04
370,500	3,757,700	Worker	2.41E-04	8.38E-05	1.26E-04	9.19E-05	3.26E-04	2.09E-04	1.02E-04	3.60E-05	9.19E-05	3.26E-04
370,600	3,757,700	Worker	2.29E-04	7.58E-05	1.10E-04	8.37E-05	2.89E-04	1.77E-04	9.32E-05	2.97E-05	8.37E-05	2.89E-04
370,700	3,757,700	Worker	2.28E-04	7.16E-05	1.08E-04	8.06E-05	2.90E-04	1.82E-04	9.19E-05	2.94E-05	8.06E-05	2.90E-04
370,800	3,757,700	Worker	1.82E-04	6.34E-05	9.45E-05	6.73E-05	2.45E-04	1.59E-04	8.34E-05	2.90E-05	6.73E-05	2.45E-04
370,900	3,757,700	Worker	1.56E-04	5.70E-05	8.23E-05	5.83E-05	2.09E-04	1.35E-04	7.66E-05	2.58E-05	5.83E-05	2.09E-04
371,000	3,757,700	Worker	1.66E-04	5.56E-05	7.91E-05	5.83E-05	2.08E-04	1.30E-04	7.62E-05	2.23E-05	5.83E-05	2.08E-04
371,100	3,757,700	Worker	1.35E-04	4.83E-05	6.46E-05	4.83E-05	1.66E-04	1.01E-04	6.66E-05	1.86E-05	4.83E-05	1.66E-04
371,200	3,757,700	Worker	1.08E-04	4.15E-05	5.26E-05	3.99E-05	1.31E-04	7.82E-05	5.73E-05	1.56E-05	3.99E-05	1.31E-04
371,300	3,757,700	Worker	8.56E-05	3.47E-05	4.51E-05	3.33E-05	1.10E-04	6.90E-05	4.77E-05	1.51E-05	3.33E-05	1.10E-04
371,400	3,757,700	Worker	6.58E-05	2.90E-05	3.85E-05	2.79E-05	9.19E-05	6.04E-05	3.93E-05	1.46E-05	2.79E-05	9.19E-05
366,500	3,757,800	Residential	2.28E-04	1.06E-04	9.08E-05	2.14E-04	2.51E-04	1.34E-04	7.40E-05	5.43E-05	2.14E-04	2.51E-04
366,600	3,757,800	Residential	4.29E-04	1.67E-04	1.55E-04	3.85E-04	4.69E-04	2.59E-04	1.20E-04	1.02E-04	3.85E-04	4.69E-04
366,700	3,757,800	Residential	2.82E-04	1.21E-04	1.04E-04	2.48E-04	2.93E-04	1.59E-04	8.45E-05	6.26E-05	2.48E-04	2.93E-04
366,800	3,757,800	Residential	3.30E-04	1.31E-04	1.14E-04	2.76E-04	3.32E-04	1.83E-04	9.09E-05	7.04E-05	2.76E-04	3.32E-04
366,900	3,757,800	Worker	3.86E-04	1.40E-04	1.23E-04	3.01E-04	3.68E-04	2.07E-04	9.72E-05	7.68E-05	3.01E-04	3.86E-04
369,700	3,757,800	Worker	1.66E-04	1.77E-04	1.72E-04	1.13E-04	2.60E-04	1.41E-04	2.06E-04	6.78E-05	1.13E-04	2.60E-04
369,800	3,757,800	Worker	1.76E-04	1.69E-04	1.72E-04	1.05E-04	2.74E-04	1.58E-04	2.10E-04	6.00E-05	1.05E-04	2.74E-04
369,900	3,757,800	Worker	1.85E-04	1.56E-04	1.67E-04	9.89E-05	2.86E-04	1.75E-04	2.04E-04	4.95E-05	9.89E-05	2.86E-04
370,000	3,757,800	Worker	2.02E-04	1.35E-04	1.61E-04	9.66E-05	3.11E-04	2.01E-04	1.77E-04	4.59E-05	9.66E-05	3.11E-04
370,100	3,757,800	Worker	2.22E-04	1.30E-04	1.64E-04	9.62E-05	3.39E-04	2.27E-04	1.80E-04	4.94E-05	9.62E-05	3.39E-04
370,200	3,757,800	Worker	2.43E-04	1.15E-04	1.62E-04	9.76E-05	3.68E-04	2.52E-04	1.62E-04	5.18E-05	9.76E-05	3.68E-04
370,300	3,757,800	Worker	2.65E-04	1.01E-04	1.56E-04	9.89E-05	3.87E-04	2.65E-04	1.41E-04	5.09E-05	9.89E-05	3.87E-04
370,400	3,757,800	Worker	2.90E-04	8.76E-05	1.52E-04	1.02E-04	4.10E-04	2.79E-04	1.19E-04	4.93E-05	1.02E-04	4.10E-04
370,500	3,757,800	Worker	3.03E-04	8.89E-05	1.47E-04	1.01E-04	4.03E-04	2.66E-04	1.26E-04	4.32E-05	1.01E-04	4.03E-04
370,600	3,757,800	Worker	2.91E-04	8.53E-05	1.34E-04	9.43E-05	3.69E-04	2.36E-04	1.24E-04	3.62E-05	9.43E-05	3.69E-04
370,700	3,757,800	Worker	3.00E-04	8.08E-05	1.32E-04	9.44E-05	3.77E-04	2.42E-04	1.19E-04	3.41E-05	9.44E-05	3.77E-04
370,800	3,757,800	Worker	2.15E-04	6.50E-05	1.03E-04	7.16E-05	2.81E-04	1.85E-04	9.56E-05	3.01E-05	7.16E-05	2.81E-04

Table H.6-2 Construction Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index for Area 1 Peak Day	Acute Hazard Index for Area 2 Peak Day	Acute Hazard Index for Area 3 Peak Day	Acute Hazard Index for Area 4 Peak Day	Acute Hazard Index for Area 11 Peak Day	Acute Hazard Index for Area 12A West Peak Day	Acute Hazard Index for Area 12A East Peak Day	Acute Hazard Index for Area 13 Peak Day	Acute Hazard Index for Project Peak Day	Maximum Acute Hazard Index
370,900	3,757,800	Worker	2.14E-04	6.17E-05	9.46E-05	6.98E-05	2.65E-04	1.67E-04	8.98E-05	2.48E-05	6.98E-05	2.65E-04
371,000	3,757,800	Worker	1.85E-04	5.44E-05	7.83E-05	6.07E-05	2.19E-04	1.34E-04	7.81E-05	1.95E-05	6.07E-05	2.19E-04
371,100	3,757,800	Worker	1.48E-04	4.51E-05	6.61E-05	5.10E-05	1.83E-04	1.14E-04	6.36E-05	1.82E-05	5.10E-05	1.83E-04
371,200	3,757,800	Worker	1.10E-04	3.62E-05	5.43E-05	4.11E-05	1.46E-04	9.61E-05	4.97E-05	1.74E-05	4.11E-05	1.46E-04
371,300	3,757,800	Worker	9.39E-05	3.11E-05	4.82E-05	3.66E-05	1.30E-04	8.75E-05	4.17E-05	1.63E-05	3.66E-05	1.30E-04
371,400	3,757,800	Worker	9.74E-05	2.93E-05	4.72E-05	3.69E-05	1.32E-04	8.80E-05	3.87E-05	1.50E-05	3.69E-05	1.32E-04
366,500	3,757,900	Residential	3.21E-04	1.36E-04	1.23E-04	2.92E-04	3.55E-04	1.95E-04	9.80E-05	7.46E-05	2.92E-04	3.55E-04
366,600	3,757,900	Residential	4.24E-04	1.85E-04	1.60E-04	3.83E-04	4.58E-04	2.50E-04	1.32E-04	9.71E-05	3.83E-04	4.58E-04
366,700	3,757,900	Residential	2.82E-04	1.28E-04	1.06E-04	2.50E-04	2.92E-04	1.57E-04	8.84E-05	6.12E-05	2.50E-04	2.92E-04
366,800	3,757,900	Residential	2.73E-04	1.34E-04	1.02E-04	2.27E-04	2.61E-04	1.41E-04	9.24E-05	5.10E-05	2.27E-04	2.73E-04
366,900	3,757,900	Residential	3.27E-04	1.45E-04	1.08E-04	2.38E-04	2.82E-04	1.56E-04	9.97E-05	5.22E-05	2.38E-04	3.27E-04
367,600	3,757,900	Sensitive	5.07E-04	4.58E-04	2.78E-04	5.99E-04	5.35E-04	2.41E-04	3.00E-04	8.90E-05	5.99E-04	5.99E-04
367,700	3,757,900	Sensitive	4.63E-04	6.51E-04	3.68E-04	7.76E-04	5.94E-04	2.24E-04	4.22E-04	9.16E-05	7.76E-04	7.76E-04
370,900	3,757,900	Worker	2.95E-04	6.63E-05	1.13E-04	9.13E-05	3.51E-04	2.18E-04	9.47E-05	2.37E-05	9.13E-05	3.51E-04
371,000	3,757,900	Sensitive	2.17E-04	5.06E-05	8.95E-05	7.12E-05	2.73E-04	1.76E-04	7.05E-05	2.22E-05	7.12E-05	2.73E-04
371,100	3,757,900	Worker	1.56E-04	3.87E-05	7.01E-05	5.51E-05	2.09E-04	1.40E-04	5.21E-05	2.03E-05	5.51E-05	2.09E-04
371,200	3,757,900	Worker	1.54E-04	3.62E-05	6.64E-05	5.35E-05	2.01E-04	1.34E-04	4.78E-05	1.81E-05	5.35E-05	2.01E-04
371,300	3,757,900	Worker	1.43E-04	3.30E-05	6.04E-05	4.97E-05	1.85E-04	1.21E-04	4.28E-05	1.60E-05	4.97E-05	1.85E-04
371,400	3,757,900	Worker	1.27E-04	2.96E-05	5.36E-05	4.50E-05	1.64E-04	1.07E-04	3.77E-05	1.40E-05	4.50E-05	1.64E-04
366,500	3,758,000	Residential	3.79E-04	2.01E-04	1.62E-04	3.44E-04	4.06E-04	2.15E-04	1.45E-04	8.44E-05	3.44E-04	4.06E-04
366,600	3,758,000	Residential	3.70E-04	1.84E-04	1.47E-04	3.14E-04	3.75E-04	2.03E-04	1.32E-04	7.61E-05	3.14E-04	3.75E-04
366,700	3,758,000	Residential	2.18E-04	1.18E-04	8.83E-05	1.88E-04	2.13E-04	1.12E-04	8.24E-05	4.14E-05	1.88E-04	2.18E-04
366,800	3,758,000	Residential	2.09E-04	1.23E-04	9.00E-05	1.89E-04	2.10E-04	1.08E-04	8.55E-05	4.06E-05	1.89E-04	2.10E-04
366,900	3,758,000	Residential	2.41E-04	1.35E-04	9.85E-05	2.08E-04	2.32E-04	1.22E-04	9.38E-05	4.42E-05	2.08E-04	2.41E-04
367,000	3,758,000	Residential	2.95E-04	1.53E-04	1.10E-04	2.32E-04	2.63E-04	1.41E-04	1.06E-04	4.79E-05	2.32E-04	2.95E-04
367,100	3,758,000	Residential	3.58E-04	1.73E-04	1.25E-04	2.71E-04	3.11E-04	1.69E-04	1.19E-04	5.66E-05	2.71E-04	3.58E-04
367,200	3,758,000	Residential	4.22E-04	1.95E-04	1.45E-04	3.26E-04	3.77E-04	2.06E-04	1.33E-04	7.11E-05	3.26E-04	4.22E-04
367,300	3,758,000	Residential	4.17E-04	2.20E-04	1.50E-04	3.18E-04	3.51E-04	1.88E-04	1.49E-04	6.01E-05	3.18E-04	4.17E-04
367,400	3,758,000	Residential	4.36E-04	2.51E-04	1.65E-04	3.45E-04	3.68E-04	1.94E-04	1.69E-04	6.11E-05	3.45E-04	4.36E-04
367,500	3,758,000	Sensitive	4.41E-04	3.11E-04	1.96E-04	4.07E-04	4.00E-04	1.97E-04	2.07E-04	6.53E-05	4.07E-04	4.41E-04
367,600	3,758,000	Sensitive	4.10E-04	4.05E-04	2.41E-04	4.97E-04	4.32E-04	1.89E-04	2.67E-04	6.87E-05	4.97E-04	4.97E-04
367,700	3,758,000	Sensitive	4.32E-04	5.77E-04	3.21E-04	6.53E-04	5.00E-04	1.90E-04	3.75E-04	7.12E-05	6.53E-04	6.53E-04
368,200	3,758,000	Residential	3.86E-04	6.30E-04	3.74E-04	7.27E-04	5.80E-04	2.14E-04	4.16E-04	9.50E-05	7.27E-04	7.27E-04
368,300	3,758,000	Residential	4.42E-04	6.23E-04	3.97E-04	7.57E-04	6.69E-04	2.71E-04	4.31E-04	1.35E-04	7.57E-04	7.57E-04
368,400	3,758,000	Residential	4.25E-04	5.17E-04	3.71E-04	6.41E-04	6.48E-04	2.77E-04	3.71E-04	1.45E-04	6.41E-04	6.48E-04
368,500	3,758,000	Residential	2.90E-04	3.84E-04	2.68E-04	4.69E-04	4.47E-04	1.79E-04	2.67E-04	9.89E-05	4.69E-04	4.69E-04
368,600	3,758,000	Residential	2.90E-04	4.14E-04	2.87E-04	4.74E-04	4.51E-04	1.74E-04	2.88E-04	1.01E-04	4.74E-04	4.74E-04
369,300	3,758,000	~~Worker~~ Residential	3.41E-04	2.89E-04	4.16E-04	1.44E-04	5.72E-04	2.49E-04	2.70E-04	2.80E-04	1.44E-04	5.72E-04
370,800	3,758,000	Worker	6.24E-04	1.06E-04	2.14E-04	1.78E-04	7.22E-04	4.45E-04	1.49E-04	3.26E-05	1.78E-04	7.22E-04
370,900	3,758,000	Worker	3.59E-04	6.57E-05	1.35E-04	1.10E-04	4.42E-04	2.85E-04	8.85E-05	2.77E-05	1.10E-04	4.42E-04
371,000	3,758,000	Worker	2.91E-04	5.45E-05	1.11E-04	9.17E-05	3.60E-04	2.32E-04	7.19E-05	2.32E-05	9.17E-05	3.60E-04
371,100	3,758,000	Worker	2.34E-04	4.52E-05	8.97E-05	7.57E-05	2.90E-04	1.86E-04	5.83E-05	1.92E-05	7.57E-05	2.90E-04
371,200	3,758,000	Residential	1.86E-04	3.76E-05	7.22E-05	6.22E-05	2.31E-04	1.48E-04	4.73E-05	1.59E-05	6.22E-05	2.31E-04
371,300	3,758,000	Worker	1.47E-04	3.14E-05	5.81E-05	5.12E-05	1.84E-04	1.17E-04	3.84E-05	1.32E-05	5.12E-05	1.84E-04
371,400	3,758,000	Worker	1.16E-04	2.66E-05	4.70E-05	4.24E-05	1.46E-04	9.29E-05	3.17E-05	1.11E-05	4.24E-05	1.46E-04
366,600	3,758,100	Residential	2.66E-04	1.54E-04	1.20E-04	2.62E-04	2.99E-04	1.57E-04	1.11E-04	5.99E-05	2.62E-04	2.99E-04
366,700	3,758,100	Residential	1.70E-04	1.11E-04	8.02E-05	1.65E-04	1.79E-04	9.06E-05	7.76E-05	3.48E-05	1.65E-04	1.79E-04
366,800	3,758,100	Residential	1.82E-04	1.19E-04	8.49E-05	1.74E-04	1.89E-04	9.55E-05	8.29E-05	3.62E-05	1.74E-04	1.89E-04
366,900	3,758,100	Residential	2.07E-04	1.35E-04	9.42E-05	1.94E-04	2.08E-04	1.05E-04	9.32E-05	3.88E-05	1.94E-04	2.08E-04
367,000	3,758,100	Residential	2.53E-04	1.53E-04	1.08E-04	2.29E-04	2.48E-04	1.28E-04	1.05E-04	4.68E-05	2.29E-04	2.53E-04
367,100	3,758,100	Residential	2.74E-04	1.70E-04	1.19E-04	2.52E-04	2.70E-04	1.38E-04	1.16E-04	5.05E-05	2.52E-04	2.74E-04
367,200	3,758,100	Residential	3.37E-04	1.90E-04	1.35E-04	2.93E-04	3.20E-04	1.68E-04	1.29E-04	6.01E-05	2.93E-04	3.37E-04

Table H.6-2 Construction Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index for Area 1 Peak Day	Acute Hazard Index for Area 2 Peak Day	Acute Hazard Index for Area 3 Peak Day	Acute Hazard Index for Area 4 Peak Day	Acute Hazard Index for Area 11 Peak Day	Acute Hazard Index for Area 12A West Peak Day	Acute Hazard Index for Area 12A East Peak Day	Acute Hazard Index for Area 13 Peak Day	Acute Hazard Index for Project Peak Day	Maximum Acute Hazard Index
367,300	3,758,100	Residential	3.84E-04	2.14E-04	1.49E-04	3.19E-04	3.51E-04	1.85E-04	1.45E-04	6.27E-05	3.19E-04	3.84E-04
367,400	3,758,100	Residential	2.71E-04	2.39E-04	1.52E-04	3.08E-04	2.91E-04	1.34E-04	1.61E-04	5.11E-05	3.08E-04	3.08E-04
367,500	3,758,100	Residential	2.94E-04	2.79E-04	1.73E-04	3.51E-04	3.20E-04	1.43E-04	1.86E-04	5.49E-05	3.51E-04	3.51E-04
367,600	3,758,100	Sensitive	3.07E-04	3.47E-04	2.05E-04	4.14E-04	3.50E-04	1.46E-04	2.30E-04	5.67E-05	4.14E-04	4.14E-04
367,700	3,758,100	Sensitive	3.49E-04	4.94E-04	2.73E-04	5.44E-04	4.10E-04	1.52E-04	3.22E-04	5.77E-05	5.44E-04	5.44E-04
368,000	3,758,100	Residential	4.30E-04	6.55E-04	3.67E-04	7.03E-04	5.43E-04	2.03E-04	4.39E-04	8.03E-05	7.03E-04	7.03E-04
368,100	3,758,100	Residential	3.45E-04	4.88E-04	2.91E-04	5.50E-04	4.58E-04	1.80E-04	3.27E-04	7.23E-05	5.50E-04	5.50E-04
368,200	3,758,100	Residential	2.60E-04	3.78E-04	2.33E-04	4.32E-04	3.65E-04	1.39E-04	2.55E-04	6.79E-05	4.32E-04	4.32E-04
368,300	3,758,100	Residential	3.13E-04	3.94E-04	2.64E-04	4.78E-04	4.57E-04	1.94E-04	2.76E-04	8.73E-05	4.78E-04	4.78E-04
368,400	3,758,100	Residential	3.46E-04	4.06E-04	2.87E-04	5.09E-04	5.15E-04	2.26E-04	2.94E-04	1.15E-04	5.09E-04	5.15E-04
368,500	3,758,100	Residential	2.83E-04	3.13E-04	2.37E-04	3.90E-04	4.25E-04	1.88E-04	2.23E-04	9.34E-05	3.90E-04	4.25E-04
368,600	3,758,100	Residential	2.42E-04	2.93E-04	2.25E-04	3.43E-04	3.71E-04	1.53E-04	2.11E-04	9.20E-05	3.43E-04	3.71E-04
368,700	3,758,100	Residential	3.28E-04	3.54E-04	2.89E-04	4.26E-04	5.06E-04	2.25E-04	2.64E-04	1.20E-04	4.26E-04	5.06E-04
368,800	3,758,100	Residential	3.90E-04	4.93E-04	3.77E-04	5.43E-04	6.08E-04	2.56E-04	3.67E-04	1.56E-04	5.43E-04	6.08E-04
369,300	3,758,100	Worker	2.42E-04	2.63E-04	3.05E-04	1.61E-04	4.02E-04	1.65E-04	2.36E-04	3.94E-04	1.61E-04	4.02E-04
370,800	3,758,100	Worker	7.64E-04	1.25E-04	2.53E-04	2.16E-04	8.69E-04	5.27E-04	1.73E-04	3.17E-05	2.16E-04	8.69E-04
370,900	3,758,100	Worker	4.38E-04	7.85E-05	1.54E-04	1.31E-04	5.13E-04	3.17E-04	1.05E-04	2.36E-05	1.31E-04	5.13E-04
371,000	3,758,100	Sensitive	2.82E-04	5.59E-05	1.04E-04	9.02E-05	3.37E-04	2.09E-04	7.20E-05	1.79E-05	9.02E-05	3.37E-04
371,100	3,758,100	Worker	1.92E-04	4.24E-05	7.39E-05	6.58E-05	2.32E-04	1.44E-04	5.27E-05	1.40E-05	6.58E-05	2.32E-04
371,200	3,758,100	Residential	1.35E-04	3.36E-05	5.45E-05	5.00E-05	1.66E-04	1.03E-04	4.02E-05	1.13E-05	5.00E-05	1.66E-04
371,300	3,758,100	Residential	9.83E-05	2.76E-05	4.17E-05	3.95E-05	1.22E-04	7.55E-05	3.19E-05	9.44E-06	3.95E-05	1.22E-04
371,400	3,758,100	Residential	7.39E-05	2.34E-05	3.29E-05	3.24E-05	9.30E-05	5.70E-05	2.61E-05	8.04E-06	3.24E-05	9.30E-05
366,600	3,758,200	Residential	1.52E-04	1.02E-04	7.30E-05	1.51E-04	1.62E-04	8.16E-05	7.10E-05	3.18E-05	1.51E-04	1.62E-04
366,700	3,758,200	Residential	1.51E-04	1.05E-04	7.41E-05	1.51E-04	1.61E-04	8.07E-05	7.28E-05	3.14E-05	1.51E-04	1.61E-04
366,800	3,758,200	Residential	1.61E-04	1.13E-04	7.90E-05	1.61E-04	1.71E-04	8.50E-05	7.81E-05	3.29E-05	1.61E-04	1.71E-04
366,900	3,758,200	Residential	1.69E-04	1.23E-04	8.56E-05	1.74E-04	1.82E-04	8.98E-05	8.50E-05	3.52E-05	1.74E-04	1.82E-04
367,000	3,758,200	Residential	2.02E-04	1.34E-04	9.50E-05	1.98E-04	2.12E-04	1.07E-04	9.23E-05	4.13E-05	1.98E-04	2.12E-04
367,100	3,758,200	Residential	2.13E-04	1.47E-04	1.01E-04	2.07E-04	2.17E-04	1.08E-04	1.01E-04	4.09E-05	2.07E-04	2.17E-04
367,200	3,758,200	Residential	2.19E-04	1.61E-04	1.08E-04	2.19E-04	2.25E-04	1.10E-04	1.10E-04	4.17E-05	2.19E-04	2.25E-04
367,300	3,758,200	Residential	2.22E-04	1.76E-04	1.17E-04	2.34E-04	2.34E-04	1.12E-04	1.20E-04	4.31E-05	2.34E-04	2.34E-04
367,400	3,758,200	Residential	2.07E-04	1.91E-04	1.26E-04	2.51E-04	2.41E-04	1.10E-04	1.30E-04	4.56E-05	2.51E-04	2.51E-04
367,500	3,758,200	Residential	2.25E-04	2.36E-04	1.48E-04	2.93E-04	2.65E-04	1.15E-04	1.58E-04	4.74E-05	2.93E-04	2.93E-04
367,600	3,758,200	Residential	2.71E-04	3.11E-04	1.85E-04	3.67E-04	3.13E-04	1.30E-04	2.06E-04	5.18E-05	3.67E-04	3.67E-04
367,700	3,758,200	Residential	2.97E-04	4.52E-04	2.50E-04	4.89E-04	3.64E-04	1.30E-04	2.95E-04	5.13E-05	4.89E-04	4.89E-04
367,800	3,758,200	Worker	3.38E-04	4.70E-04	2.66E-04	5.08E-04	4.02E-04	1.54E-04	3.08E-04	5.47E-05	5.08E-04	5.08E-04
367,900	3,758,200	Sensitive	2.99E-04	3.40E-04	2.10E-04	3.86E-04	3.51E-04	1.51E-04	2.31E-04	5.55E-05	3.86E-04	3.86E-04
368,000	3,758,200	Sensitive	3.39E-04	3.73E-04	2.33E-04	4.24E-04	3.95E-04	1.73E-04	2.60E-04	6.67E-05	4.24E-04	4.24E-04
368,100	3,758,200	Residential	3.45E-04	3.94E-04	2.47E-04	4.43E-04	4.13E-04	1.80E-04	2.77E-04	7.39E-05	4.43E-04	4.43E-04
368,200	3,758,200	Residential	2.42E-04	2.80E-04	1.84E-04	3.29E-04	3.10E-04	1.30E-04	1.93E-04	6.23E-05	3.29E-04	3.29E-04
368,300	3,758,200	Residential	2.60E-04	2.63E-04	1.90E-04	3.25E-04	3.47E-04	1.58E-04	1.85E-04	7.18E-05	3.25E-04	3.47E-04
368,400	3,758,200	Residential	2.91E-04	3.11E-04	2.27E-04	3.77E-04	4.07E-04	1.85E-04	2.33E-04	9.04E-05	3.77E-04	4.07E-04
368,500	3,758,200	Residential	2.70E-04	2.78E-04	2.15E-04	3.50E-04	3.95E-04	1.80E-04	2.03E-04	8.94E-05	3.50E-04	3.95E-04
368,600	3,758,200	Residential	2.06E-04	2.47E-04	1.87E-04	2.83E-04	3.09E-04	1.30E-04	1.80E-04	8.08E-05	2.83E-04	3.09E-04
368,700	3,758,200	Residential	2.76E-04	2.78E-04	2.33E-04	3.31E-04	4.15E-04	1.92E-04	2.18E-04	1.06E-04	3.31E-04	4.15E-04
368,800	3,758,200	Residential	3.29E-04	3.31E-04	2.92E-04	3.77E-04	5.06E-04	2.33E-04	2.72E-04	1.64E-04	3.77E-04	5.06E-04
368,900	3,758,200	Residential	3.25E-04	3.32E-04	3.13E-04	3.51E-04	5.12E-04	2.26E-04	2.64E-04	1.47E-04	3.51E-04	5.12E-04
369,000	3,758,200	Worker	3.36E-04	3.73E-04	3.53E-04	3.61E-04	5.38E-04	2.26E-04	2.84E-04	1.74E-04	3.61E-04	5.38E-04
369,100	3,758,200	Worker	3.47E-04	3.63E-04	3.74E-04	3.26E-04	5.61E-04	2.39E-04	2.90E-04	2.26E-04	3.26E-04	5.61E-04
369,200	3,758,200	Worker	2.61E-04	3.21E-04	3.09E-04	2.66E-04	4.26E-04	1.69E-04	2.59E-04	3.26E-04	2.66E-04	4.26E-04
370,300	3,758,200	Sensitive	4.48E-04	1.28E-04	2.67E-04	1.59E-04	7.39E-04	5.66E-04	1.96E-04	7.95E-05	1.59E-04	7.39E-04
370,800	3,758,200	Worker	7.97E-04	1.38E-04	2.49E-04	2.22E-04	8.58E-04	4.94E-04	1.92E-04	2.09E-05	2.22E-04	8.58E-04
370,900	3,758,200	Worker	3.81E-04	7.66E-05	1.29E-04	1.16E-04	4.22E-04	2.46E-04	1.02E-04	1.54E-05	1.16E-04	4.22E-04
371,000	3,758,200	Worker	2.15E-04	5.09E-05	7.91E-05	7.33E-05	2.46E-04	1.45E-04	6.40E-05	1.25E-05	7.33E-05	2.46E-04

Table H.6-2 Construction Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index for Area 1 Peak Day	Acute Hazard Index for Area 2 Peak Day	Acute Hazard Index for Area 3 Peak Day	Acute Hazard Index for Area 4 Peak Day	Acute Hazard Index for Area 11 Peak Day	Acute Hazard Index for Area 12A West Peak Day	Acute Hazard Index for Area 12A East Peak Day	Acute Hazard Index for Area 13 Peak Day	Acute Hazard Index for Project Peak Day	Maximum Acute Hazard Index
371,100	3,758,200	Worker	1.27E-04	3.66E-05	5.22E-05	5.05E-05	1.52E-04	9.08E-05	4.32E-05	1.08E-05	5.05E-05	1.52E-04
371,200	3,758,200	Residential	8.82E-05	2.96E-05	3.95E-05	3.96E-05	1.09E-04	6.56E-05	3.35E-05	9.49E-06	3.96E-05	1.09E-04
371,300	3,758,200	Residential	6.85E-05	2.57E-05	3.25E-05	3.36E-05	8.67E-05	5.19E-05	2.81E-05	8.51E-06	3.36E-05	8.67E-05
366,700	3,758,300	Residential	1.31E-04	9.47E-05	6.79E-05	1.35E-04	1.45E-04	7.13E-05	6.60E-05	2.84E-05	1.35E-04	1.45E-04
366,800	3,758,300	Residential	1.38E-04	1.03E-04	7.31E-05	1.45E-04	1.54E-04	7.51E-05	7.15E-05	3.01E-05	1.45E-04	1.54E-04
366,900	3,758,300	Residential	1.46E-04	1.09E-04	7.75E-05	1.53E-04	1.62E-04	7.91E-05	7.58E-05	3.18E-05	1.53E-04	1.62E-04
367,000	3,758,300	Residential	1.63E-04	1.15E-04	8.18E-05	1.62E-04	1.74E-04	8.62E-05	7.96E-05	3.39E-05	1.62E-04	1.74E-04
367,100	3,758,300	Residential	1.62E-04	1.18E-04	8.38E-05	1.63E-04	1.75E-04	8.58E-05	8.22E-05	3.39E-05	1.63E-04	1.75E-04
367,200	3,758,300	Residential	1.75E-04	1.35E-04	9.31E-05	1.81E-04	1.88E-04	9.08E-05	9.33E-05	3.57E-05	1.81E-04	1.88E-04
367,300	3,758,300	Residential	1.62E-04	1.60E-04	1.06E-04	2.08E-04	2.00E-04	8.90E-05	1.09E-04	3.82E-05	2.08E-04	2.08E-04
367,400	3,758,300	Sensitive	1.72E-04	1.85E-04	1.19E-04	2.30E-04	2.12E-04	9.15E-05	1.26E-04	3.90E-05	2.30E-04	2.30E-04
367,500	3,758,300	Worker	1.89E-04	2.24E-04	1.38E-04	2.68E-04	2.34E-04	9.70E-05	1.51E-04	4.10E-05	2.68E-04	2.68E-04
367,600	3,758,300	Residential	2.49E-04	2.43E-04	1.60E-04	3.13E-04	3.01E-04	1.37E-04	1.65E-04	5.30E-05	3.13E-04	3.13E-04
367,700	3,758,300	Residential	3.01E-04	3.34E-04	2.06E-04	3.94E-04	3.59E-04	1.57E-04	2.32E-04	6.08E-05	3.94E-04	3.94E-04
367,800	3,758,300	Sensitive	2.67E-04	2.53E-04	1.64E-04	2.90E-04	2.92E-04	1.37E-04	1.82E-04	5.12E-05	2.90E-04	2.92E-04
367,900	3,758,300	Sensitive	2.52E-04	2.22E-04	1.51E-04	2.59E-04	2.76E-04	1.33E-04	1.61E-04	4.75E-05	2.59E-04	2.76E-04
368,000	3,758,300	Sensitive	2.45E-04	2.43E-04	1.64E-04	2.82E-04	2.93E-04	1.36E-04	1.77E-04	5.27E-05	2.82E-04	2.93E-04
368,100	3,758,300	Sensitive	2.78E-04	2.74E-04	1.86E-04	3.18E-04	3.32E-04	1.55E-04	2.02E-04	6.46E-05	3.18E-04	3.32E-04
368,200	3,758,300	Residential	2.60E-04	2.49E-04	1.73E-04	2.94E-04	3.14E-04	1.47E-04	1.80E-04	5.86E-05	2.94E-04	3.14E-04
368,300	3,758,300	Residential	2.03E-04	2.13E-04	1.47E-04	2.53E-04	2.55E-04	1.11E-04	1.52E-04	5.65E-05	2.53E-04	2.55E-04
368,400	3,758,300	Residential	2.76E-04	2.43E-04	1.83E-04	2.99E-04	3.49E-04	1.71E-04	1.89E-04	7.88E-05	2.99E-04	3.49E-04
368,500	3,758,300	Residential	2.77E-04	2.45E-04	1.96E-04	2.99E-04	3.70E-04	1.81E-04	1.95E-04	9.16E-05	2.99E-04	3.70E-04
368,600	3,758,300	Sensitive	2.41E-04	2.17E-04	1.84E-04	2.65E-04	3.40E-04	1.61E-04	1.63E-04	8.37E-05	2.65E-04	3.40E-04
368,700	3,758,300	Sensitive	2.72E-04	2.52E-04	2.22E-04	2.96E-04	4.00E-04	1.90E-04	2.03E-04	1.01E-04	2.96E-04	4.00E-04
368,800	3,758,300	Residential	3.20E-04	3.24E-04	2.99E-04	3.29E-04	4.90E-04	2.25E-04	2.71E-04	1.57E-04	3.29E-04	4.90E-04
368,900	3,758,300	Residential	2.93E-04	2.69E-04	2.57E-04	2.93E-04	4.47E-04	2.14E-04	2.31E-04	1.37E-04	2.93E-04	4.47E-04
369,000	3,758,300	Worker	2.62E-04	2.25E-04	2.33E-04	2.46E-04	4.05E-04	1.91E-04	1.83E-04	1.37E-04	2.46E-04	4.05E-04
369,100	3,758,300	Worker	2.48E-04	2.17E-04	2.08E-04	2.50E-04	3.79E-04	1.86E-04	1.78E-04	1.69E-04	2.50E-04	3.79E-04
369,200	3,758,300	Worker	2.53E-04	2.04E-04	1.99E-04	2.44E-04	3.84E-04	1.98E-04	1.76E-04	2.43E-04	2.44E-04	3.84E-04
369,300	3,758,300	Worker	2.73E-04	2.28E-04	2.36E-04	2.40E-04	4.23E-04	2.14E-04	1.99E-04	3.50E-04	2.40E-04	4.23E-04
369,800	3,758,300	Residential	1.73E-04	1.39E-04	1.50E-04	1.03E-04	2.62E-04	1.54E-04	1.72E-04	5.94E-05	1.03E-04	2.62E-04
369,900	3,758,300	Residential	1.77E-04	1.24E-04	1.41E-04	9.67E-05	2.68E-04	1.65E-04	1.56E-04	4.79E-05	9.67E-05	2.68E-04
370,000	3,758,300	Residential	1.91E-04	1.20E-04	1.41E-04	9.83E-05	2.87E-04	1.86E-04	1.60E-04	4.44E-05	9.83E-05	2.87E-04
370,100	3,758,300	Residential	2.27E-04	1.17E-04	1.52E-04	1.05E-04	3.44E-04	2.34E-04	1.62E-04	4.51E-05	1.05E-04	3.44E-04
370,200	3,758,300	Residential	2.52E-04	1.07E-04	1.59E-04	1.08E-04	3.91E-04	2.79E-04	1.51E-04	4.70E-05	1.08E-04	3.91E-04
370,300	3,758,300	Residential	3.03E-04	9.86E-05	1.74E-04	1.18E-04	4.68E-04	3.40E-04	1.37E-04	5.10E-05	1.18E-04	4.68E-04
370,400	3,758,300	Residential	3.98E-04	1.05E-04	2.13E-04	1.41E-04	6.06E-04	4.44E-04	1.50E-04	6.01E-05	1.41E-04	6.06E-04
370,500	3,758,300	Residential	5.13E-04	1.10E-04	2.58E-04	1.71E-04	7.74E-04	5.69E-04	1.58E-04	7.18E-05	1.71E-04	7.74E-04
370,600	3,758,300	Residential	6.00E-04	1.13E-04	2.77E-04	1.91E-04	8.64E-04	6.20E-04	1.61E-04	7.15E-05	1.91E-04	8.64E-04
370,700	3,758,300	Residential	6.33E-04	1.17E-04	2.52E-04	1.92E-04	8.11E-04	5.39E-04	1.63E-04	5.01E-05	1.92E-04	8.11E-04
370,800	3,758,300	Residential	6.45E-04	1.16E-04	2.29E-04	1.89E-04	7.58E-04	4.71E-04	1.61E-04	3.38E-05	1.89E-04	7.58E-04
370,900	3,758,300	Worker	3.64E-04	7.41E-05	1.36E-04	1.15E-04	4.35E-04	2.71E-04	9.78E-05	2.31E-05	1.15E-04	4.35E-04
371,000	3,758,300	Worker	2.66E-04	5.96E-05	9.88E-05	8.84E-05	3.11E-04	1.88E-04	7.67E-05	1.65E-05	8.84E-05	3.11E-04
371,100	3,758,300	Worker	2.40E-04	5.45E-05	8.67E-05	8.05E-05	2.74E-04	1.61E-04	6.94E-05	1.36E-05	8.05E-05	2.74E-04
371,200	3,758,300	Sensitive	2.04E-04	4.76E-05	7.54E-05	7.10E-05	2.36E-04	1.40E-04	5.94E-05	1.29E-05	7.10E-05	2.36E-04
366,900	3,758,400	Residential	1.65E-04	9.31E-05	7.35E-05	1.53E-04	1.76E-04	9.15E-05	6.63E-05	3.66E-05	1.53E-04	1.76E-04
367,000	3,758,400	Residential	1.31E-04	1.06E-04	7.40E-05	1.41E-04	1.48E-04	7.05E-05	7.44E-05	2.87E-05	1.41E-04	1.48E-04
367,100	3,758,400	Residential	1.44E-04	1.20E-04	8.18E-05	1.57E-04	1.60E-04	7.53E-05	8.40E-05	3.04E-05	1.57E-04	1.60E-04
367,200	3,758,400	Residential	1.40E-04	1.32E-04	8.88E-05	1.71E-04	1.68E-04	7.64E-05	9.19E-05	3.25E-05	1.71E-04	1.71E-04
367,300	3,758,400	Residential	1.33E-04	1.54E-04	9.99E-05	1.92E-04	1.76E-04	7.47E-05	1.06E-04	3.37E-05	1.92E-04	1.92E-04
367,400	3,758,400	Residential	1.44E-04	1.68E-04	1.08E-04	2.07E-04	1.88E-04	7.95E-05	1.16E-04	3.59E-05	2.07E-04	2.07E-04
367,500	3,758,400	Worker	1.60E-04	1.75E-04	1.14E-04	2.20E-04	2.06E-04	8.88E-05	1.21E-04	4.00E-05	2.20E-04	2.20E-04
367,600	3,758,400	Residential	2.04E-04	1.82E-04	1.28E-04	2.40E-04	2.53E-04	1.21E-04	1.28E-04	4.71E-05	2.40E-04	2.53E-04

Table H.6-2 Construction Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index for Area 1 Peak Day	Acute Hazard Index for Area 2 Peak Day	Acute Hazard Index for Area 3 Peak Day	Acute Hazard Index for Area 4 Peak Day	Acute Hazard Index for Area 11 Peak Day	Acute Hazard Index for Area 12A West Peak Day	Acute Hazard Index for Area 12A East Peak Day	Acute Hazard Index for Area 13 Peak Day	Acute Hazard Index for Project Peak Day	Maximum Acute Hazard Index
367,700	3,758,400	Residential	2.33E-04	2.11E-04	1.44E-04	2.55E-04	2.72E-04	1.31E-04	1.55E-04	5.06E-05	2.55E-04	2.72E-04
367,800	3,758,400	Sensitive	2.20E-04	1.92E-04	1.34E-04	2.22E-04	2.50E-04	1.24E-04	1.46E-04	4.90E-05	2.22E-04	2.50E-04
367,900	3,758,400	Sensitive	2.27E-04	1.70E-04	1.26E-04	2.06E-04	2.50E-04	1.30E-04	1.33E-04	5.07E-05	2.06E-04	2.50E-04
368,000	3,758,400	Sensitive	2.33E-04	1.75E-04	1.29E-04	2.10E-04	2.57E-04	1.34E-04	1.36E-04	5.27E-05	2.10E-04	2.57E-04
368,100	3,758,400	Sensitive	2.27E-04	2.10E-04	1.46E-04	2.44E-04	2.70E-04	1.32E-04	1.58E-04	5.22E-05	2.44E-04	2.70E-04
368,200	3,758,400	Residential	2.19E-04	2.03E-04	1.48E-04	2.40E-04	2.75E-04	1.33E-04	1.54E-04	5.43E-05	2.40E-04	2.75E-04
368,300	3,758,400	Residential	1.72E-04	1.69E-04	1.26E-04	2.00E-04	2.22E-04	1.00E-04	1.24E-04	5.14E-05	2.00E-04	2.22E-04
368,400	3,758,400	Residential	2.39E-04	2.02E-04	1.60E-04	2.46E-04	3.03E-04	1.48E-04	1.52E-04	6.42E-05	2.46E-04	3.03E-04
368,500	3,758,400	Residential	2.61E-04	2.14E-04	1.76E-04	2.54E-04	3.33E-04	1.67E-04	1.72E-04	7.58E-05	2.54E-04	3.33E-04
368,600	3,758,400	Sensitive	2.50E-04	1.84E-04	1.70E-04	2.26E-04	3.30E-04	1.67E-04	1.51E-04	7.70E-05	2.26E-04	3.30E-04
368,700	3,758,400	Sensitive	2.69E-04	2.08E-04	1.89E-04	2.56E-04	3.68E-04	1.87E-04	1.73E-04	8.88E-05	2.56E-04	3.68E-04
368,800	3,758,400	Residential	2.82E-04	2.29E-04	2.12E-04	2.74E-04	4.00E-04	2.00E-04	1.92E-04	1.20E-04	2.74E-04	4.00E-04
368,900	3,758,400	Worker	2.22E-04	1.84E-04	1.79E-04	2.07E-04	3.24E-04	1.59E-04	1.45E-04	9.75E-05	2.07E-04	3.24E-04
369,000	3,758,400	Worker	2.08E-04	1.73E-04	1.68E-04	2.00E-04	3.08E-04	1.50E-04	1.40E-04	1.16E-04	2.00E-04	3.08E-04
369,100	3,758,400	Worker	2.15E-04	1.62E-04	1.55E-04	2.07E-04	3.16E-04	1.67E-04	1.39E-04	1.33E-04	2.07E-04	3.16E-04
369,200	3,758,400	Worker	2.35E-04	1.71E-04	1.71E-04	2.13E-04	3.50E-04	1.90E-04	1.63E-04	1.60E-04	2.13E-04	3.50E-04
369,300	3,758,400	Worker	2.55E-04	1.92E-04	1.94E-04	2.23E-04	3.84E-04	2.10E-04	1.93E-04	1.35E-04	2.23E-04	3.84E-04
369,800	3,758,400	Residential	1.61E-04	1.34E-04	1.33E-04	1.21E-04	2.43E-04	1.37E-04	1.40E-04	7.30E-05	1.21E-04	2.43E-04
369,900	3,758,400	Residential	1.65E-04	1.16E-04	1.30E-04	1.08E-04	2.54E-04	1.52E-04	1.23E-04	6.09E-05	1.08E-04	2.54E-04
370,000	3,758,400	Residential	1.75E-04	1.02E-04	1.29E-04	9.92E-05	2.72E-04	1.73E-04	1.13E-04	5.26E-05	9.92E-05	2.72E-04
370,100	3,758,400	Residential	3.02E-04	1.16E-04	1.77E-04	1.29E-04	4.43E-04	2.98E-04	1.46E-04	5.60E-05	1.29E-04	4.43E-04
370,200	3,758,400	Residential	2.20E-04	1.00E-04	1.39E-04	1.01E-04	3.26E-04	2.18E-04	1.29E-04	4.25E-05	1.01E-04	3.26E-04
370,300	3,758,400	Residential	2.55E-04	9.54E-05	1.44E-04	1.05E-04	3.67E-04	2.48E-04	1.24E-04	4.07E-05	1.05E-04	3.67E-04
370,400	3,758,400	Residential	2.75E-04	8.86E-05	1.45E-04	1.08E-04	3.93E-04	2.69E-04	1.16E-04	4.03E-05	1.08E-04	3.93E-04
370,500	3,758,400	Residential	2.85E-04	8.59E-05	1.37E-04	1.07E-04	3.82E-04	2.53E-04	1.14E-04	3.37E-05	1.07E-04	3.82E-04
370,600	3,758,400	Residential	3.46E-04	8.85E-05	1.67E-04	1.23E-04	4.87E-04	3.38E-04	1.21E-04	4.30E-05	1.23E-04	4.87E-04
370,700	3,758,400	Residential	2.66E-04	7.41E-05	1.37E-04	9.91E-05	3.89E-04	2.75E-04	1.01E-04	3.74E-05	9.91E-05	3.89E-04
370,800	3,758,400	Residential	2.99E-04	7.56E-05	1.32E-04	1.03E-04	3.90E-04	2.58E-04	1.03E-04	2.92E-05	1.03E-04	3.90E-04
370,900	3,758,400	Worker	2.98E-04	6.97E-05	1.26E-04	1.01E-04	3.83E-04	2.51E-04	9.36E-05	2.73E-05	1.01E-04	3.83E-04
371,000	3,758,400	Worker	2.94E-04	6.46E-05	1.20E-04	9.83E-05	3.72E-04	2.42E-04	8.51E-05	2.52E-05	9.83E-05	3.72E-04
371,100	3,758,400	Worker	3.01E-04	6.28E-05	1.22E-04	9.98E-05	3.83E-04	2.50E-04	8.23E-05	2.59E-05	9.98E-05	3.83E-04
371,200	3,758,400	Worker	2.82E-04	6.02E-05	1.07E-04	9.31E-05	3.39E-04	2.11E-04	7.81E-05	1.95E-05	9.31E-05	3.39E-04
367,400	3,758,500	Residential	1.30E-04	1.37E-04	9.33E-05	1.78E-04	1.73E-04	7.67E-05	9.61E-05	3.53E-05	1.78E-04	1.78E-04
367,500	3,758,500	Worker	1.60E-04	1.40E-04	1.04E-04	1.96E-04	2.14E-04	1.03E-04	9.96E-05	4.24E-05	1.96E-04	2.14E-04
367,600	3,758,500	Worker	1.67E-04	1.47E-04	1.06E-04	1.92E-04	2.11E-04	1.03E-04	1.07E-04	3.97E-05	1.92E-04	2.11E-04
367,700	3,758,500	Worker	1.83E-04	1.64E-04	1.14E-04	1.89E-04	2.13E-04	1.07E-04	1.25E-04	4.22E-05	1.89E-04	2.13E-04
367,800	3,758,500	Worker	1.82E-04	1.42E-04	1.03E-04	1.66E-04	2.02E-04	1.06E-04	1.12E-04	3.91E-05	1.66E-04	2.02E-04
367,900	3,758,500	Sensitive	1.95E-04	1.36E-04	1.11E-04	1.65E-04	2.26E-04	1.22E-04	1.14E-04	5.41E-05	1.65E-04	2.26E-04
368,000	3,758,500	Sensitive	2.00E-04	1.33E-04	1.09E-04	1.65E-04	2.26E-04	1.22E-04	1.10E-04	4.90E-05	1.65E-04	2.26E-04
368,100	3,758,500	Sensitive	2.05E-04	1.46E-04	1.17E-04	1.76E-04	2.35E-04	1.24E-04	1.17E-04	4.62E-05	1.76E-04	2.35E-04
368,200	3,758,500	Sensitive	2.00E-04	1.62E-04	1.27E-04	1.92E-04	2.44E-04	1.23E-04	1.24E-04	4.75E-05	1.92E-04	2.44E-04
368,600	3,758,500	Residential	2.56E-04	2.03E-04	1.69E-04	2.41E-04	3.27E-04	1.66E-04	1.60E-04	8.92E-05	2.41E-04	3.27E-04
368,700	3,758,500	Residential	2.60E-04	1.85E-04	1.71E-04	2.30E-04	3.40E-04	1.76E-04	1.48E-04	1.01E-04	2.30E-04	3.40E-04
368,800	3,758,500	Worker	2.37E-04	1.50E-04	1.51E-04	1.98E-04	3.17E-04	1.69E-04	1.27E-04	8.87E-05	1.98E-04	3.17E-04
368,900	3,758,500	Worker	2.24E-04	1.53E-04	1.55E-04	1.90E-04	3.10E-04	1.62E-04	1.28E-04	9.28E-05	1.90E-04	3.10E-04
369,000	3,758,500	Worker	2.08E-04	1.51E-04	1.41E-04	1.84E-04	2.86E-04	1.54E-04	1.32E-04	9.31E-05	1.84E-04	2.86E-04
369,100	3,758,500	Worker	1.92E-04	1.41E-04	1.31E-04	1.72E-04	2.69E-04	1.46E-04	1.24E-04	9.46E-05	1.72E-04	2.69E-04
369,200	3,758,500	Worker	2.38E-04	1.90E-04	1.71E-04	2.16E-04	3.39E-04	1.85E-04	1.91E-04	1.09E-04	2.16E-04	3.39E-04
369,300	3,758,500	Worker	2.34E-04	1.80E-04	1.67E-04	2.11E-04	3.37E-04	1.85E-04	1.87E-04	8.98E-05	2.11E-04	3.37E-04
369,800	3,758,500	Residential	1.58E-04	1.24E-04	1.24E-04	1.33E-04	2.42E-04	1.37E-04	1.17E-04	6.54E-05	1.33E-04	2.42E-04
369,900	3,758,500	Residential	1.68E-04	1.12E-04	1.19E-04	1.25E-04	2.53E-04	1.50E-04	1.05E-04	6.30E-05	1.25E-04	2.53E-04
370,000	3,758,500	Residential	1.74E-04	1.03E-04	1.18E-04	1.15E-04	2.58E-04	1.56E-04	9.87E-05	5.70E-05	1.15E-04	2.58E-04
370,100	3,758,500	Residential	1.90E-04	1.02E-04	1.24E-04	1.08E-04	2.77E-04	1.71E-04	1.09E-04	5.12E-05	1.08E-04	2.77E-04

Table H.6-2 Construction Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index for Area 1 Peak Day	Acute Hazard Index for Area 2 Peak Day	Acute Hazard Index for Area 3 Peak Day	Acute Hazard Index for Area 4 Peak Day	Acute Hazard Index for Area 11 Peak Day	Acute Hazard Index for Area 12A West Peak Day	Acute Hazard Index for Area 12A East Peak Day	Acute Hazard Index for Area 13 Peak Day	Acute Hazard Index for Project Peak Day	Maximum Acute Hazard Index
370,200	3,758,500	Residential	1.98E-04	9.79E-05	1.24E-04	9.89E-05	2.82E-04	1.77E-04	1.15E-04	4.36E-05	9.89E-05	2.82E-04
370,300	3,758,500	Residential	2.01E-04	8.85E-05	1.21E-04	9.19E-05	2.87E-04	1.85E-04	1.08E-04	3.82E-05	9.19E-05	2.87E-04
370,400	3,758,500	Residential	2.02E-04	8.32E-05	1.11E-04	8.95E-05	2.73E-04	1.71E-04	1.02E-04	3.10E-05	8.95E-05	2.73E-04
370,500	3,758,500	Residential	2.06E-04	7.87E-05	1.05E-04	8.81E-05	2.68E-04	1.65E-04	9.78E-05	2.72E-05	8.81E-05	2.68E-04
370,600	3,758,500	Residential	1.98E-04	6.75E-05	1.05E-04	8.49E-05	2.80E-04	1.87E-04	8.18E-05	3.05E-05	8.49E-05	2.80E-04
370,700	3,758,500	Residential	1.86E-04	6.29E-05	1.04E-04	8.07E-05	2.79E-04	1.95E-04	7.85E-05	3.18E-05	8.07E-05	2.79E-04
370,800	3,758,500	Residential	1.69E-04	5.94E-05	9.35E-05	7.33E-05	2.48E-04	1.72E-04	7.58E-05	2.76E-05	7.33E-05	2.48E-04
370,900	3,758,500	Worker	2.52E-04	6.81E-05	1.14E-04	9.25E-05	3.31E-04	2.18E-04	8.97E-05	2.70E-05	9.25E-05	3.31E-04
371,000	3,758,500	Worker	2.95E-04	7.18E-05	1.30E-04	1.03E-04	3.90E-04	2.60E-04	9.69E-05	3.01E-05	1.03E-04	3.90E-04
371,100	3,758,500	Worker	3.32E-04	7.75E-05	1.44E-04	1.12E-04	4.36E-04	2.91E-04	1.08E-04	3.16E-05	1.12E-04	4.36E-04
371,200	3,758,500	Worker	2.73E-04	6.69E-05	1.24E-04	9.59E-05	3.69E-04	2.51E-04	9.10E-05	2.98E-05	9.59E-05	3.69E-04
367,500	3,758,600	Residential	1.64E-04	1.65E-04	1.16E-04	2.14E-04	2.26E-04	1.08E-04	1.23E-04	4.43E-05	2.14E-04	2.26E-04
367,600	3,758,600	Residential	1.59E-04	1.52E-04	1.07E-04	1.84E-04	2.04E-04	1.01E-04	1.17E-04	4.16E-05	1.84E-04	2.04E-04
367,700	3,758,600	Sensitive	1.54E-04	1.42E-04	1.01E-04	1.51E-04	1.81E-04	9.17E-05	1.14E-04	3.84E-05	1.51E-04	1.81E-04
367,800	3,758,600	Worker	1.96E-04	1.52E-04	1.27E-04	1.57E-04	2.31E-04	1.19E-04	1.27E-04	5.31E-05	1.57E-04	2.31E-04
367,900	3,758,600	Worker	2.10E-04	1.44E-04	1.33E-04	1.55E-04	2.51E-04	1.31E-04	1.23E-04	5.88E-05	1.55E-04	2.51E-04
368,000	3,758,600	Sensitive	1.68E-04	1.15E-04	9.79E-05	1.41E-04	2.00E-04	1.07E-04	9.53E-05	4.01E-05	1.41E-04	2.00E-04
368,100	3,758,600	Sensitive	1.75E-04	1.11E-04	9.78E-05	1.40E-04	2.05E-04	1.11E-04	9.14E-05	3.93E-05	1.40E-04	2.05E-04
368,800	3,758,600	Worker	2.18E-04	1.47E-04	1.42E-04	1.80E-04	2.86E-04	1.51E-04	1.30E-04	7.36E-05	1.80E-04	2.86E-04
368,900	3,758,600	Worker	2.02E-04	1.24E-04	1.23E-04	1.65E-04	2.64E-04	1.43E-04	1.09E-04	7.68E-05	1.65E-04	2.64E-04
369,000	3,758,600	Worker	1.88E-04	1.13E-04	1.08E-04	1.57E-04	2.43E-04	1.35E-04	1.03E-04	7.22E-05	1.57E-04	2.43E-04
369,100	3,758,600	Worker	1.72E-04	1.18E-04	1.08E-04	1.47E-04	2.26E-04	1.22E-04	1.08E-04	7.59E-05	1.47E-04	2.26E-04
369,200	3,758,600	Worker	1.91E-04	1.57E-04	1.33E-04	1.70E-04	2.54E-04	1.36E-04	1.55E-04	5.90E-05	1.70E-04	2.54E-04
369,300	3,758,600	Worker	1.96E-04	1.57E-04	1.38E-04	1.78E-04	2.75E-04	1.54E-04	1.59E-04	6.72E-05	1.78E-04	2.75E-04
369,400	3,758,600	Residential	1.95E-04	1.47E-04	1.42E-04	1.71E-04	2.88E-04	1.67E-04	1.53E-04	6.68E-05	1.71E-04	2.88E-04
369,500	3,758,600	Residential	2.28E-04	1.61E-04	1.67E-04	1.91E-04	3.46E-04	2.01E-04	1.64E-04	8.52E-05	1.91E-04	3.46E-04
369,600	3,758,600	Residential	2.20E-04	1.29E-04	1.48E-04	1.67E-04	3.28E-04	1.91E-04	1.24E-04	8.72E-05	1.67E-04	3.28E-04
369,700	3,758,600	Residential	2.06E-04	1.20E-04	1.33E-04	1.55E-04	3.00E-04	1.73E-04	1.13E-04	7.01E-05	1.55E-04	3.00E-04
369,800	3,758,600	Residential	2.36E-04	1.19E-04	1.45E-04	1.63E-04	3.46E-04	2.08E-04	1.10E-04	7.36E-05	1.63E-04	3.46E-04
369,900	3,758,600	Residential	2.62E-04	1.21E-04	1.52E-04	1.73E-04	3.79E-04	2.32E-04	1.13E-04	6.61E-05	1.73E-04	3.79E-04
370,000	3,758,600	Residential	2.65E-04	1.11E-04	1.46E-04	1.60E-04	3.78E-04	2.36E-04	1.07E-04	6.29E-05	1.60E-04	3.78E-04
370,100	3,758,600	Residential	1.73E-04	9.59E-05	1.08E-04	1.20E-04	2.48E-04	1.47E-04	9.08E-05	5.05E-05	1.20E-04	2.48E-04
370,200	3,758,600	Residential	1.73E-04	9.55E-05	1.10E-04	1.06E-04	2.47E-04	1.50E-04	9.94E-05	4.57E-05	1.06E-04	2.47E-04
370,300	3,758,600	Residential	1.72E-04	9.13E-05	1.06E-04	9.66E-05	2.38E-04	1.42E-04	1.01E-04	3.96E-05	9.66E-05	2.38E-04
370,400	3,758,600	Residential	1.62E-04	8.22E-05	9.50E-05	8.50E-05	2.14E-04	1.24E-04	9.34E-05	3.21E-05	8.50E-05	2.14E-04
370,500	3,758,600	Residential	1.55E-04	7.20E-05	8.83E-05	7.58E-05	2.05E-04	1.22E-04	8.36E-05	2.79E-05	7.58E-05	2.05E-04
370,600	3,758,600	Residential	1.19E-04	6.23E-05	7.65E-05	6.47E-05	1.72E-04	1.07E-04	7.21E-05	2.54E-05	6.47E-05	1.72E-04
370,700	3,758,600	Residential	1.54E-04	5.96E-05	8.92E-05	7.37E-05	2.27E-04	1.52E-04	6.88E-05	2.84E-05	7.37E-05	2.27E-04
370,800	3,758,600	Residential	1.59E-04	5.45E-05	9.26E-05	7.42E-05	2.47E-04	1.74E-04	6.25E-05	3.10E-05	7.42E-05	2.47E-04
370,900	3,758,600	Residential	2.09E-04	5.92E-05	1.10E-04	8.66E-05	3.13E-04	2.21E-04	7.23E-05	3.39E-05	8.66E-05	3.13E-04
371,000	3,758,600	Worker	2.73E-04	7.48E-05	1.30E-04	1.02E-04	3.75E-04	2.54E-04	1.01E-04	3.27E-05	1.02E-04	3.75E-04
371,100	3,758,600	Residential	2.20E-04	7.34E-05	1.05E-04	8.53E-05	2.85E-04	1.84E-04	1.01E-04	2.38E-05	8.53E-05	2.85E-04
367,600	3,758,700	Residential	1.32E-04	1.32E-04	9.57E-05	1.48E-04	1.73E-04	8.46E-05	1.03E-04	3.54E-05	1.48E-04	1.73E-04
367,700	3,758,700	Residential	1.44E-04	1.30E-04	1.06E-04	1.27E-04	1.79E-04	8.86E-05	1.04E-04	3.53E-05	1.27E-04	1.79E-04
367,800	3,758,700	Residential	1.72E-04	1.26E-04	1.17E-04	1.24E-04	2.09E-04	1.09E-04	1.04E-04	4.11E-05	1.24E-04	2.09E-04
369,000	3,758,700	Residential	1.62E-04	1.04E-04	9.33E-05	1.44E-04	2.09E-04	1.16E-04	9.55E-05	6.47E-05	1.44E-04	2.09E-04
369,100	3,758,700	Residential	1.66E-04	9.67E-05	9.73E-05	1.36E-04	2.20E-04	1.27E-04	9.26E-05	6.06E-05	1.36E-04	2.20E-04
369,200	3,758,700	Residential	2.11E-04	1.43E-04	1.37E-04	1.74E-04	2.88E-04	1.68E-04	1.47E-04	5.64E-05	1.74E-04	2.88E-04
369,300	3,758,700	Residential	2.00E-04	1.39E-04	1.30E-04	1.58E-04	2.73E-04	1.63E-04	1.46E-04	5.82E-05	1.58E-04	2.73E-04
369,400	3,758,700	Residential	2.05E-04	1.30E-04	1.29E-04	1.53E-04	2.81E-04	1.67E-04	1.32E-04	5.41E-05	1.53E-04	2.81E-04
369,500	3,758,700	Residential	2.11E-04	1.22E-04	1.32E-04	1.49E-04	2.95E-04	1.75E-04	1.25E-04	5.58E-05	1.49E-04	2.95E-04
369,600	3,758,700	Residential	2.22E-04	1.17E-04	1.38E-04	1.52E-04	3.17E-04	1.89E-04	1.15E-04	6.83E-05	1.52E-04	3.17E-04
369,700	3,758,700	Residential	1.93E-04	1.04E-04	1.21E-04	1.39E-04	2.77E-04	1.61E-04	9.49E-05	6.59E-05	1.39E-04	2.77E-04

Table H.6-2 Construction Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index for Area 1 Peak Day	Acute Hazard Index for Area 2 Peak Day	Acute Hazard Index for Area 3 Peak Day	Acute Hazard Index for Area 4 Peak Day	Acute Hazard Index for Area 11 Peak Day	Acute Hazard Index for Area 12A West Peak Day	Acute Hazard Index for Area 12A East Peak Day	Acute Hazard Index for Area 13 Peak Day	Acute Hazard Index for Project Peak Day	Maximum Acute Hazard Index
369,800	3,758,700	Residential	2.33E-04	1.08E-04	1.33E-04	1.59E-04	3.32E-04	2.00E-04	1.01E-04	6.28E-05	1.59E-04	3.32E-04
369,900	3,758,700	Residential	2.78E-04	1.28E-04	1.58E-04	1.90E-04	4.00E-04	2.43E-04	1.18E-04	7.75E-05	1.90E-04	4.00E-04
370,000	3,758,700	Residential	2.65E-04	1.24E-04	1.49E-04	1.79E-04	3.76E-04	2.26E-04	1.15E-04	6.61E-05	1.79E-04	3.76E-04
370,100	3,758,700	Residential	2.42E-04	9.98E-05	1.30E-04	1.48E-04	3.41E-04	2.10E-04	9.36E-05	5.14E-05	1.48E-04	3.41E-04
370,200	3,758,700	Sensitive	1.56E-04	8.83E-05	9.40E-05	1.13E-04	2.19E-04	1.27E-04	8.39E-05	4.10E-05	1.13E-04	2.19E-04
370,300	3,758,700	Residential	1.42E-04	8.74E-05	8.86E-05	1.01E-04	1.94E-04	1.08E-04	8.83E-05	3.76E-05	1.01E-04	1.94E-04
370,400	3,758,700	Residential	1.46E-04	8.43E-05	8.84E-05	9.46E-05	1.95E-04	1.09E-04	8.89E-05	3.50E-05	9.46E-05	1.95E-04
370,500	3,758,700	Residential	1.36E-04	7.49E-05	8.48E-05	8.59E-05	1.90E-04	1.12E-04	7.91E-05	3.38E-05	8.59E-05	1.90E-04
370,600	3,758,700	Residential	1.11E-04	6.45E-05	7.37E-05	7.30E-05	1.61E-04	9.62E-05	6.82E-05	3.00E-05	7.30E-05	1.61E-04
370,700	3,758,700	Residential	1.42E-04	6.28E-05	8.57E-05	7.44E-05	2.08E-04	1.35E-04	7.13E-05	3.05E-05	7.44E-05	2.08E-04
370,800	3,758,700	Residential	1.51E-04	5.94E-05	9.36E-05	7.41E-05	2.37E-04	1.65E-04	6.96E-05	3.27E-05	7.41E-05	2.37E-04
370,900	3,758,700	Residential	1.51E-04	5.98E-05	9.14E-05	7.38E-05	2.32E-04	1.61E-04	7.14E-05	3.07E-05	7.38E-05	2.32E-04
371,000	3,758,700	Worker	2.11E-04	6.63E-05	1.12E-04	8.99E-05	3.08E-04	2.12E-04	8.15E-05	3.33E-05	8.99E-05	3.08E-04
369,000	3,758,800	Residential	1.53E-04	1.00E-04	9.22E-05	1.39E-04	2.08E-04	1.19E-04	8.86E-05	5.52E-05	1.39E-04	2.08E-04
369,100	3,758,800	Residential	1.94E-04	1.21E-04	1.16E-04	1.60E-04	2.61E-04	1.53E-04	1.20E-04	5.22E-05	1.60E-04	2.61E-04
369,200	3,758,800	Residential	2.42E-04	1.45E-04	1.44E-04	1.84E-04	3.21E-04	1.88E-04	1.51E-04	5.64E-05	1.84E-04	3.21E-04
369,300	3,758,800	Residential	2.38E-04	1.27E-04	1.32E-04	1.69E-04	3.09E-04	1.84E-04	1.32E-04	6.05E-05	1.69E-04	3.09E-04
369,400	3,758,800	Residential	2.11E-04	1.12E-04	1.19E-04	1.41E-04	2.79E-04	1.71E-04	1.21E-04	4.92E-05	1.41E-04	2.79E-04
369,500	3,758,800	Residential	1.91E-04	1.03E-04	1.12E-04	1.22E-04	2.56E-04	1.57E-04	1.09E-04	4.22E-05	1.22E-04	2.56E-04
369,600	3,758,800	Residential	1.92E-04	9.63E-05	1.11E-04	1.24E-04	2.59E-04	1.54E-04	9.26E-05	4.73E-05	1.24E-04	2.59E-04
369,700	3,758,800	Residential	1.98E-04	9.16E-05	1.13E-04	1.27E-04	2.73E-04	1.62E-04	8.30E-05	5.59E-05	1.27E-04	2.73E-04
369,800	3,758,800	Residential	2.36E-04	1.05E-04	1.32E-04	1.56E-04	3.33E-04	2.03E-04	9.25E-05	6.48E-05	1.56E-04	3.33E-04
369,900	3,758,800	Residential	2.54E-04	1.19E-04	1.38E-04	1.76E-04	3.52E-04	2.10E-04	1.08E-04	6.53E-05	1.76E-04	3.52E-04
370,000	3,758,800	Residential	2.54E-04	1.07E-04	1.37E-04	1.63E-04	3.56E-04	2.17E-04	1.01E-04	6.07E-05	1.63E-04	3.56E-04
370,100	3,758,800	Residential	2.27E-04	9.39E-05	1.22E-04	1.44E-04	3.18E-04	1.92E-04	8.60E-05	5.15E-05	1.44E-04	3.18E-04
370,200	3,758,800	Sensitive	1.66E-04	8.56E-05	9.36E-05	1.19E-04	2.26E-04	1.28E-04	7.80E-05	3.69E-05	1.19E-04	2.26E-04
369,100	3,758,900	Residential	1.92E-04	1.30E-04	1.18E-04	1.63E-04	2.58E-04	1.47E-04	1.29E-04	4.19E-05	1.63E-04	2.58E-04
369,200	3,758,900	Residential	2.36E-04	1.46E-04	1.40E-04	1.88E-04	3.15E-04	1.81E-04	1.41E-04	5.13E-05	1.88E-04	3.15E-04
369,300	3,758,900	Residential	2.24E-04	1.20E-04	1.25E-04	1.65E-04	2.98E-04	1.79E-04	1.23E-04	5.53E-05	1.65E-04	2.98E-04
369,400	3,758,900	Residential	1.96E-04	1.00E-04	1.07E-04	1.37E-04	2.58E-04	1.57E-04	1.07E-04	4.61E-05	1.37E-04	2.58E-04
369,500	3,758,900	Residential	1.86E-04	8.69E-05	9.89E-05	1.16E-04	2.43E-04	1.48E-04	9.18E-05	3.78E-05	1.16E-04	2.43E-04
369,600	3,758,900	Residential	1.73E-04	7.67E-05	9.21E-05	1.02E-04	2.28E-04	1.39E-04	7.25E-05	3.64E-05	1.02E-04	2.28E-04
369,700	3,758,900	Residential	1.74E-04	7.54E-05	9.63E-05	1.05E-04	2.37E-04	1.46E-04	6.72E-05	4.34E-05	1.05E-04	2.37E-04
369,800	3,758,900	Residential	2.28E-04	1.02E-04	1.22E-04	1.44E-04	3.05E-04	1.82E-04	9.04E-05	6.11E-05	1.44E-04	3.05E-04
369,900	3,758,900	Residential	2.35E-04	1.02E-04	1.24E-04	1.48E-04	3.17E-04	1.92E-04	9.35E-05	5.71E-05	1.48E-04	3.17E-04
370,000	3,758,900	Residential	2.19E-04	8.83E-05	1.13E-04	1.36E-04	2.99E-04	1.84E-04	8.33E-05	4.71E-05	1.36E-04	2.99E-04
370,100	3,758,900	Residential	1.72E-04	7.95E-05	9.56E-05	1.20E-04	2.40E-04	1.42E-04	7.02E-05	4.47E-05	1.20E-04	2.40E-04
369,200	3,759,000	Residential	2.00E-04	1.38E-04	1.28E-04	1.75E-04	2.79E-04	1.59E-04	1.27E-04	4.55E-05	1.75E-04	2.79E-04
369,300	3,759,000	Residential	1.97E-04	1.19E-04	1.14E-04	1.57E-04	2.63E-04	1.53E-04	1.21E-04	4.69E-05	1.57E-04	2.63E-04
369,400	3,759,000	Residential	1.90E-04	9.24E-05	1.00E-04	1.34E-04	2.52E-04	1.53E-04	9.72E-05	4.27E-05	1.34E-04	2.52E-04
369,500	3,759,000	Residential	1.75E-04	7.60E-05	9.01E-05	1.15E-04	2.32E-04	1.43E-04	7.72E-05	3.69E-05	1.15E-04	2.32E-04
369,600	3,759,000	Residential	1.58E-04	6.64E-05	8.20E-05	1.02E-04	2.12E-04	1.32E-04	5.99E-05	3.48E-05	1.02E-04	2.12E-04
369,700	3,759,000	Residential	1.77E-04	7.00E-05	8.85E-05	1.02E-04	2.29E-04	1.40E-04	6.30E-05	3.52E-05	1.02E-04	2.29E-04
369,800	3,759,000	Residential	2.02E-04	8.51E-05	1.03E-04	1.15E-04	2.60E-04	1.57E-04	7.69E-05	4.43E-05	1.15E-04	2.60E-04
369,900	3,759,000	Residential	2.09E-04	8.48E-05	1.08E-04	1.19E-04	2.77E-04	1.71E-04	7.91E-05	4.83E-05	1.19E-04	2.77E-04
370,000	3,759,000	Residential	1.63E-04	7.07E-05	8.81E-05	1.02E-04	2.21E-04	1.35E-04	6.42E-05	4.00E-05	1.02E-04	2.21E-04
370,755	3,757,840	Fenceline	3.17E-04	8.09E-05	1.34E-04	9.86E-05	3.93E-04	2.51E-04	1.20E-04	3.24E-05	9.86E-05	3.93E-04
370,824	3,757,856	Fenceline	2.45E-04	6.64E-05	1.07E-04	7.93E-05	3.08E-04	1.98E-04	9.74E-05	2.78E-05	7.93E-05	3.08E-04
370,910	3,757,807	Fenceline	2.21E-04	6.21E-05	9.50E-05	7.13E-05	2.70E-04	1.69E-04	9.03E-05	2.40E-05	7.13E-05	2.70E-04
370,975	3,757,834	Fenceline	2.05E-04	5.63E-05	8.45E-05	6.66E-05	2.44E-04	1.49E-04	8.08E-05	2.01E-05	6.66E-05	2.44E-04
370,900	3,757,862	Fenceline	2.63E-04	6.57E-05	1.03E-04	8.21E-05	3.08E-04	1.89E-04	9.51E-05	2.23E-05	8.21E-05	3.08E-04
370,822	3,757,910	Fenceline	3.28E-04	7.41E-05	1.25E-04	1.00E-04	3.87E-04	2.39E-04	1.07E-04	2.55E-05	1.00E-04	3.87E-04
370,796	3,758,005	Fenceline	6.55E-04	1.10E-04	2.23E-04	1.87E-04	7.56E-04	4.64E-04	1.54E-04	3.31E-05	1.87E-04	7.56E-04

Table H.6-2 Construction Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index for Area 1 Peak Day	Acute Hazard Index for Area 2 Peak Day	Acute Hazard Index for Area 3 Peak Day	Acute Hazard Index for Area 4 Peak Day	Acute Hazard Index for Area 11 Peak Day	Acute Hazard Index for Area 12A West Peak Day	Acute Hazard Index for Area 12A East Peak Day	Acute Hazard Index for Area 13 Peak Day	Acute Hazard Index for Project Peak Day	Maximum Acute Hazard Index
370,796	3,758,105	Fenceline	7.89E-04	1.29E-04	2.60E-04	2.22E-04	8.95E-04	5.41E-04	1.79E-04	3.16E-05	2.22E-04	8.95E-04
370,797	3,758,205	Fenceline	8.17E-04	1.41E-04	2.55E-04	2.27E-04	8.78E-04	5.04E-04	1.97E-04	2.09E-05	2.27E-04	8.78E-04
370,770	3,758,280	Fenceline	7.96E-04	1.38E-04	2.73E-04	2.27E-04	9.18E-04	5.63E-04	1.92E-04	3.61E-05	2.27E-04	9.18E-04
370,670	3,758,281	Fenceline	7.38E-04	1.29E-04	2.93E-04	2.21E-04	9.51E-04	6.36E-04	1.82E-04	5.86E-05	2.21E-04	9.51E-04
370,570	3,758,283	Fenceline	6.74E-04	1.18E-04	3.26E-04	2.15E-04	1.02E-03	7.55E-04	1.69E-04	9.13E-05	2.15E-04	1.02E-03
370,470	3,758,284	Fenceline	5.54E-04	1.14E-04	2.90E-04	1.85E-04	8.71E-04	6.56E-04	1.65E-04	8.52E-05	1.85E-04	8.71E-04
370,438	3,758,237	Fenceline	6.11E-04	1.18E-04	3.38E-04	2.06E-04	1.02E-03	7.93E-04	1.72E-04	1.07E-04	2.06E-04	1.02E-03
370,358	3,758,203	Fenceline	5.70E-04	1.26E-04	3.30E-04	1.96E-04	9.64E-04	7.54E-04	1.90E-04	1.04E-04	1.96E-04	9.64E-04
370,265	3,758,168	Fenceline	4.63E-04	1.39E-04	2.88E-04	1.65E-04	7.84E-04	6.11E-04	2.18E-04	8.82E-05	1.65E-04	7.84E-04
370,227	3,758,230	Fenceline	3.24E-04	1.21E-04	2.00E-04	1.24E-04	5.12E-04	3.78E-04	1.83E-04	5.68E-05	1.24E-04	5.12E-04
370,185	3,758,286	Fenceline	2.57E-04	1.11E-04	1.63E-04	1.09E-04	3.98E-04	2.84E-04	1.58E-04	4.76E-05	1.09E-04	3.98E-04
370,085	3,758,282	Fenceline	2.24E-04	1.21E-04	1.52E-04	1.04E-04	3.37E-04	2.29E-04	1.70E-04	4.39E-05	1.04E-04	3.37E-04
369,985	3,758,283	Fenceline	1.92E-04	1.24E-04	1.44E-04	9.82E-05	2.89E-04	1.87E-04	1.68E-04	4.42E-05	9.82E-05	2.89E-04
369,885	3,758,284	Fenceline	1.80E-04	1.30E-04	1.45E-04	9.76E-05	2.72E-04	1.68E-04	1.69E-04	4.84E-05	9.76E-05	2.72E-04
369,787	3,758,287	Fenceline	1.74E-04	1.44E-04	1.54E-04	1.03E-04	2.64E-04	1.55E-04	1.81E-04	5.92E-05	1.03E-04	2.64E-04
369,788	3,758,387	Fenceline	1.61E-04	1.37E-04	1.36E-04	1.21E-04	2.42E-04	1.35E-04	1.45E-04	7.42E-05	1.21E-04	2.42E-04
369,789	3,758,487	Fenceline	1.54E-04	1.27E-04	1.24E-04	1.33E-04	2.37E-04	1.33E-04	1.20E-04	6.78E-05	1.33E-04	2.37E-04
369,783	3,758,580	Fenceline	1.67E-04	1.15E-04	1.21E-04	1.39E-04	2.51E-04	1.41E-04	1.05E-04	6.68E-05	1.39E-04	2.51E-04
369,683	3,758,581	Fenceline	2.27E-04	1.27E-04	1.46E-04	1.69E-04	3.36E-04	2.00E-04	1.20E-04	7.83E-05	1.69E-04	3.36E-04
369,583	3,758,582	Fenceline	2.16E-04	1.31E-04	1.50E-04	1.68E-04	3.27E-04	1.90E-04	1.26E-04	9.12E-05	1.68E-04	3.27E-04
369,483	3,758,583	Fenceline	2.22E-04	1.65E-04	1.68E-04	1.95E-04	3.40E-04	1.96E-04	1.68E-04	8.67E-05	1.95E-04	3.40E-04
369,388	3,758,579	Fenceline	2.01E-04	1.52E-04	1.45E-04	1.77E-04	2.94E-04	1.67E-04	1.58E-04	7.02E-05	1.77E-04	2.94E-04
369,387	3,758,479	Fenceline	2.40E-04	1.73E-04	1.75E-04	2.01E-04	3.52E-04	1.92E-04	1.78E-04	9.59E-05	2.01E-04	3.52E-04
369,386	3,758,379	Fenceline	2.60E-04	1.97E-04	2.08E-04	2.16E-04	3.96E-04	2.13E-04	1.90E-04	1.99E-04	2.16E-04	3.96E-04
369,330	3,758,305	Fenceline	2.75E-04	2.30E-04	2.37E-04	2.37E-04	4.25E-04	2.17E-04	2.07E-04	3.39E-04	2.37E-04	4.25E-04
369,253	3,758,241	Fenceline	2.73E-04	2.72E-04	2.70E-04	2.55E-04	4.32E-04	2.00E-04	2.29E-04	4.55E-04	2.55E-04	4.55E-04
369,246	3,758,171	Fenceline	2.55E-04	3.15E-04	3.11E-04	2.39E-04	4.18E-04	1.66E-04	2.63E-04	4.39E-04	2.39E-04	4.39E-04
369,310	3,758,094	Fenceline	2.38E-04	2.53E-04	2.99E-04	1.51E-04	3.95E-04	1.64E-04	2.32E-04	3.94E-04	1.51E-04	3.95E-04
369,381	3,758,024	Fenceline	1.97E-04	1.99E-04	2.35E-04	1.12E-04	3.21E-04	1.46E-04	2.11E-04	2.09E-04	1.12E-04	3.21E-04
369,344	3,757,941	Fenceline	2.76E-04	2.92E-04	3.72E-04	1.44E-04	4.70E-04	1.86E-04	2.69E-04	2.19E-04	1.44E-04	4.70E-04
369,280	3,758,015	Fenceline	3.71E-04	3.17E-04	4.61E-04	1.52E-04	6.25E-04	2.66E-04	2.94E-04	2.90E-04	1.52E-04	6.25E-04
369,216	3,758,092	Fenceline	4.27E-04	4.25E-04	5.46E-04	2.42E-04	7.21E-04	2.90E-04	3.61E-04	3.31E-04	2.42E-04	7.21E-04
369,152	3,758,165	Fenceline	3.77E-04	4.12E-04	4.35E-04	3.30E-04	6.18E-04	2.56E-04	3.30E-04	2.75E-04	3.30E-04	6.18E-04
369,067	3,758,112	Fenceline	4.83E-04	5.85E-04	6.16E-04	4.33E-04	8.10E-04	3.02E-04	4.40E-04	2.37E-04	4.33E-04	8.10E-04
369,002	3,758,112	Fenceline	4.46E-04	6.52E-04	5.50E-04	5.63E-04	7.29E-04	2.64E-04	4.67E-04	1.89E-04	5.63E-04	7.29E-04
368,949	3,758,161	Fenceline	3.73E-04	4.67E-04	4.04E-04	4.51E-04	5.98E-04	2.41E-04	3.44E-04	1.62E-04	4.51E-04	5.98E-04
368,865	3,758,108	Fenceline	3.92E-04	5.85E-04	4.24E-04	5.92E-04	6.18E-04	2.37E-04	4.16E-04	1.39E-04	5.92E-04	6.18E-04
368,780	3,758,055	Fenceline	3.86E-04	5.84E-04	4.07E-04	6.12E-04	6.04E-04	2.33E-04	4.12E-04	1.27E-04	6.12E-04	6.12E-04
368,696	3,758,001	Fenceline	3.41E-04	5.77E-04	3.75E-04	6.02E-04	5.31E-04	1.86E-04	3.95E-04	1.07E-04	6.02E-04	6.02E-04
368,608	3,757,953	Fenceline	3.15E-04	5.54E-04	3.47E-04	5.91E-04	4.92E-04	1.70E-04	3.75E-04	9.66E-05	5.91E-04	5.91E-04
368,534	3,757,957	Fenceline	3.09E-04	4.86E-04	3.13E-04	5.52E-04	4.80E-04	1.77E-04	3.31E-04	9.84E-05	5.52E-04	5.52E-04
368,441	3,757,965	Fenceline	4.25E-04	5.38E-04	3.66E-04	6.87E-04	6.50E-04	2.75E-04	3.77E-04	1.32E-04	6.87E-04	6.87E-04
368,341	3,757,966	Fenceline	4.97E-04	6.57E-04	4.51E-04	7.96E-04	7.63E-04	3.14E-04	4.63E-04	1.61E-04	7.96E-04	7.96E-04
368,241	3,757,977	Fenceline	4.38E-04	6.59E-04	4.04E-04	7.92E-04	6.62E-04	2.58E-04	4.45E-04	1.16E-04	7.92E-04	7.92E-04
368,147	3,758,010	Fenceline	3.41E-04	6.35E-04	3.58E-04	6.95E-04	5.07E-04	1.67E-04	4.16E-04	7.92E-05	6.95E-04	6.95E-04
368,055	3,758,049	Fenceline	4.07E-04	7.26E-04	4.04E-04	7.77E-04	5.73E-04	1.97E-04	4.81E-04	7.84E-05	7.77E-04	7.77E-04
367,963	3,758,088	Fenceline	4.55E-04	7.44E-04	4.06E-04	7.86E-04	5.76E-04	2.03E-04	4.91E-04	7.39E-05	7.86E-04	7.86E-04
367,871	3,758,128	Fenceline	3.76E-04	6.20E-04	3.33E-04	6.52E-04	4.63E-04	1.56E-04	4.03E-04	5.87E-05	6.52E-04	6.52E-04
367,821	3,758,186	Fenceline	3.28E-04	4.82E-04	2.70E-04	5.14E-04	3.97E-04	1.48E-04	3.16E-04	5.33E-05	5.14E-04	5.14E-04
367,730	3,758,221	Fenceline	3.17E-04	4.36E-04	2.49E-04	4.82E-04	3.85E-04	1.49E-04	2.86E-04	5.50E-05	4.82E-04	4.82E-04
367,724	3,758,137	Fenceline	3.52E-04	5.59E-04	3.00E-04	5.96E-04	4.25E-04	1.47E-04	3.63E-04	5.53E-05	5.96E-04	5.96E-04
367,741	3,758,039	Fenceline	4.36E-04	6.85E-04	3.66E-04	7.32E-04	5.18E-04	1.77E-04	4.43E-04	6.48E-05	7.32E-04	7.32E-04
367,727	3,757,942	Fenceline	4.63E-04	6.88E-04	3.79E-04	7.83E-04	5.79E-04	2.10E-04	4.45E-04	8.27E-05	7.83E-04	7.83E-04

Table H.6-2 Construction Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index for Area 1 Peak Day	Acute Hazard Index for Area 2 Peak Day	Acute Hazard Index for Area 3 Peak Day	Acute Hazard Index for Area 4 Peak Day	Acute Hazard Index for Area 11 Peak Day	Acute Hazard Index for Area 12A West Peak Day	Acute Hazard Index for Area 12A East Peak Day	Acute Hazard Index for Area 13 Peak Day	Acute Hazard Index for Project Peak Day	Maximum Acute Hazard Index
367,704	3,757,849	Fenceline	5.09E-04	6.77E-04	3.93E-04	8.50E-04	6.69E-04	2.61E-04	4.38E-04	1.10E-04	8.50E-04	8.50E-04
367,610	3,757,869	Fenceline	4.94E-04	4.89E-04	2.98E-04	6.51E-04	5.68E-04	2.48E-04	3.20E-04	9.77E-05	6.51E-04	6.51E-04
367,528	3,757,879	Fenceline	5.83E-04	3.74E-04	2.40E-04	5.29E-04	5.30E-04	2.67E-04	2.47E-04	8.95E-05	5.29E-04	5.83E-04
367,480	3,757,967	Fenceline	5.52E-04	3.09E-04	1.97E-04	4.18E-04	4.42E-04	2.35E-04	2.06E-04	6.99E-05	4.18E-04	5.52E-04
367,412	3,757,986	Fenceline	4.85E-04	2.61E-04	1.71E-04	3.60E-04	3.91E-04	2.10E-04	1.75E-04	6.34E-05	3.60E-04	4.85E-04
367,346	3,757,925	Fenceline	6.63E-04	2.65E-04	1.81E-04	3.98E-04	4.75E-04	2.76E-04	1.78E-04	7.58E-05	3.98E-04	6.63E-04
367,257	3,757,913	Fenceline	5.98E-04	2.33E-04	1.64E-04	3.64E-04	4.40E-04	2.56E-04	1.57E-04	7.30E-05	3.64E-04	5.98E-04
367,162	3,757,938	Fenceline	6.24E-04	2.11E-04	1.67E-04	3.89E-04	4.94E-04	2.91E-04	1.44E-04	8.86E-05	3.89E-04	6.24E-04
367,072	3,757,944	Fenceline	5.61E-04	1.85E-04	1.48E-04	3.49E-04	4.42E-04	2.60E-04	1.26E-04	8.17E-05	3.49E-04	5.61E-04
366,985	3,757,894	Fenceline	4.98E-04	1.65E-04	1.25E-04	2.83E-04	3.64E-04	2.18E-04	1.13E-04	6.30E-05	2.83E-04	4.98E-04
366,976	3,757,823	Fenceline	5.02E-04	1.56E-04	1.32E-04	3.17E-04	4.08E-04	2.40E-04	1.08E-04	7.84E-05	3.17E-04	5.02E-04
367,027	3,757,737	Fenceline	5.31E-04	1.63E-04	1.80E-04	4.95E-04	6.10E-04	3.38E-04	1.13E-04	1.43E-04	4.95E-04	6.10E-04
367,076	3,757,650	Fenceline	5.19E-04	1.66E-04	1.95E-04	5.52E-04	6.68E-04	3.62E-04	1.16E-04	1.64E-04	5.52E-04	6.68E-04
367,165	3,757,636	Fenceline	5.48E-04	1.84E-04	2.09E-04	5.85E-04	7.02E-04	3.79E-04	1.28E-04	1.71E-04	5.85E-04	7.02E-04
367,265	3,757,638	Fenceline	7.84E-04	2.28E-04	2.81E-04	8.19E-04	1.00E-03	5.46E-04	1.58E-04	2.45E-04	8.19E-04	1.00E-03
367,365	3,757,639	Fenceline	6.70E-04	2.24E-04	2.54E-04	7.16E-04	8.57E-04	4.62E-04	1.54E-04	2.08E-04	7.16E-04	8.57E-04
367,465	3,757,640	Fenceline	6.33E-04	2.38E-04	2.56E-04	7.09E-04	8.32E-04	4.42E-04	1.64E-04	2.02E-04	7.09E-04	8.32E-04
367,565	3,757,642	Fenceline	6.41E-04	2.64E-04	2.72E-04	7.42E-04	8.57E-04	4.50E-04	1.80E-04	2.07E-04	7.42E-04	8.57E-04
367,665	3,757,648	Fenceline	6.01E-04	2.77E-04	2.72E-04	7.28E-04	8.24E-04	4.25E-04	1.89E-04	1.98E-04	7.28E-04	8.24E-04
367,763	3,757,658	Fenceline	7.33E-04	3.05E-04	3.26E-04	9.04E-04	1.04E-03	5.40E-04	2.09E-04	2.56E-04	9.04E-04	1.04E-03
367,795	3,757,593	Fenceline	5.06E-04	2.37E-04	2.42E-04	6.36E-04	7.28E-04	3.74E-04	1.65E-04	1.79E-04	6.36E-04	7.28E-04
367,894	3,757,604	Fenceline	5.96E-04	2.47E-04	2.72E-04	7.34E-04	8.58E-04	4.47E-04	1.73E-04	2.14E-04	7.34E-04	8.58E-04
367,994	3,757,615	Fenceline	5.55E-04	2.27E-04	2.53E-04	6.69E-04	7.92E-04	4.14E-04	1.61E-04	1.99E-04	6.69E-04	7.92E-04
368,093	3,757,626	Fenceline	5.69E-04	2.49E-04	2.69E-04	7.01E-04	8.22E-04	4.26E-04	1.76E-04	2.06E-04	7.01E-04	8.22E-04
368,192	3,757,637	Fenceline	5.04E-04	2.60E-04	2.58E-04	6.37E-04	7.32E-04	3.72E-04	1.83E-04	1.81E-04	6.37E-04	7.32E-04
368,292	3,757,647	Fenceline	3.76E-04	2.52E-04	2.21E-04	4.86E-04	5.42E-04	2.65E-04	1.78E-04	1.31E-04	4.86E-04	5.42E-04
368,391	3,757,658	Fenceline	2.72E-04	2.37E-04	1.90E-04	3.57E-04	3.91E-04	1.81E-04	1.70E-04	9.15E-05	3.57E-04	3.91E-04
368,491	3,757,669	Fenceline	2.13E-04	2.33E-04	1.75E-04	2.84E-04	3.06E-04	1.33E-04	1.69E-04	6.99E-05	2.84E-04	3.06E-04
368,590	3,757,680	Fenceline	1.84E-04	2.45E-04	1.78E-04	2.55E-04	2.69E-04	1.08E-04	1.79E-04	6.09E-05	2.55E-04	2.69E-04
368,689	3,757,691	Fenceline	1.69E-04	2.52E-04	1.83E-04	2.35E-04	2.53E-04	9.68E-05	1.86E-04	5.90E-05	2.35E-04	2.53E-04
368,789	3,757,702	Fenceline	1.71E-04	2.67E-04	1.98E-04	2.35E-04	2.62E-04	9.76E-05	1.99E-04	6.27E-05	2.35E-04	2.67E-04
368,888	3,757,712	Fenceline	1.76E-04	2.75E-04	2.12E-04	2.30E-04	2.76E-04	1.02E-04	2.07E-04	6.97E-05	2.30E-04	2.76E-04
368,988	3,757,723	Fenceline	1.81E-04	2.73E-04	2.25E-04	2.17E-04	2.89E-04	1.09E-04	2.11E-04	7.78E-05	2.17E-04	2.89E-04
369,087	3,757,734	Fenceline	1.84E-04	2.66E-04	2.32E-04	2.02E-04	2.99E-04	1.14E-04	2.12E-04	8.60E-05	2.02E-04	2.99E-04
369,186	3,757,745	Fenceline	1.86E-04	2.59E-04	2.34E-04	1.89E-04	3.03E-04	1.19E-04	2.13E-04	9.19E-05	1.89E-04	3.03E-04
369,286	3,757,756	Fenceline	1.73E-04	2.41E-04	2.10E-04	1.78E-04	2.78E-04	1.15E-04	2.07E-04	9.67E-05	1.78E-04	2.78E-04
369,385	3,757,767	Fenceline	1.82E-04	2.37E-04	2.21E-04	1.64E-04	2.93E-04	1.25E-04	2.15E-04	9.03E-05	1.64E-04	2.93E-04
369,485	3,757,777	Fenceline	1.63E-04	2.08E-04	1.85E-04	1.47E-04	2.57E-04	1.21E-04	2.03E-04	6.46E-05	1.47E-04	2.57E-04
369,584	3,757,788	Fenceline	1.57E-04	1.89E-04	1.69E-04	1.30E-04	2.44E-04	1.25E-04	2.03E-04	7.54E-05	1.30E-04	2.44E-04
369,882	3,757,821	Fenceline	1.79E-04	1.50E-04	1.62E-04	9.36E-05	2.76E-04	1.69E-04	1.98E-04	4.82E-05	9.36E-05	2.76E-04
369,982	3,757,832	Fenceline	1.93E-04	1.29E-04	1.54E-04	8.93E-05	2.98E-04	1.94E-04	1.76E-04	4.73E-05	8.93E-05	2.98E-04
370,081	3,757,843	Fenceline	2.18E-04	1.26E-04	1.61E-04	9.05E-05	3.36E-04	2.29E-04	1.84E-04	5.29E-05	9.05E-05	3.36E-04
370,181	3,757,847	Fenceline	2.47E-04	1.13E-04	1.62E-04	9.43E-05	3.76E-04	2.63E-04	1.67E-04	5.59E-05	9.43E-05	3.76E-04
370,281	3,757,846	Fenceline	2.70E-04	9.63E-05	1.57E-04	9.73E-05	4.01E-04	2.81E-04	1.40E-04	5.48E-05	9.73E-05	4.01E-04
370,381	3,757,845	Fenceline	3.00E-04	9.32E-05	1.59E-04	1.02E-04	4.26E-04	2.95E-04	1.37E-04	5.19E-05	1.02E-04	4.26E-04
370,481	3,757,843	Fenceline	3.22E-04	9.38E-05	1.59E-04	1.05E-04	4.38E-04	2.97E-04	1.41E-04	4.75E-05	1.05E-04	4.38E-04
370,581	3,757,842	Fenceline	3.29E-04	9.23E-05	1.48E-04	1.04E-04	4.17E-04	2.70E-04	1.39E-04	3.87E-05	1.04E-04	4.17E-04
370,681	3,757,841	Fenceline	3.54E-04	8.98E-05	1.51E-04	1.09E-04	4.40E-04	2.83E-04	1.34E-04	3.65E-05	1.09E-04	4.40E-04
371,014	3,757,908	Sensitive	2.06E-04	4.77E-05	8.64E-05	6.85E-05	2.64E-04	1.72E-04	6.58E-05	2.22E-05	6.85E-05	2.64E-04
370,977	3,758,096	Sensitive	3.14E-04	6.03E-05	1.14E-04	9.87E-05	3.74E-04	2.32E-04	7.86E-05	1.94E-05	9.87E-05	3.74E-04
371,426	3,758,504	Sensitive	2.16E-04	5.16E-05	8.66E-05	7.64E-05	2.66E-04	1.67E-04	6.51E-05	1.78E-05	7.64E-05	2.66E-04
370,982	3,758,117	Sensitive	2.86E-04	5.73E-05	1.05E-04	9.14E-05	3.39E-04	2.09E-04	7.40E-05	1.75E-05	9.14E-05	3.39E-04
370,977	3,758,085	Sensitive	3.24E-04	6.11E-05	1.18E-04	1.01E-04	3.86E-04	2.41E-04	7.98E-05	2.02E-05	1.01E-04	3.86E-04

Table H.6-2 Construction Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index for Area 1 Peak Day	Acute Hazard Index for Area 2 Peak Day	Acute Hazard Index for Area 3 Peak Day	Acute Hazard Index for Area 4 Peak Day	Acute Hazard Index for Area 11 Peak Day	Acute Hazard Index for Area 12A West Peak Day	Acute Hazard Index for Area 12A East Peak Day	Acute Hazard Index for Area 13 Peak Day	Acute Hazard Index for Project Peak Day	Maximum Acute Hazard Index
367,771	3,758,595	Sensitive	1.89E-04	1.57E-04	1.24E-04	1.61E-04	2.22E-04	1.13E-04	1.29E-04	4.98E-05	1.61E-04	2.22E-04
371,007	3,758,088	Sensitive	2.85E-04	5.57E-05	1.05E-04	9.08E-05	3.42E-04	2.13E-04	7.19E-05	1.85E-05	9.08E-05	3.42E-04
367,714	3,758,610	Sensitive	1.57E-04	1.43E-04	1.06E-04	1.45E-04	1.84E-04	9.20E-05	1.15E-04	3.88E-05	1.45E-04	1.84E-04
370,224	3,758,180	Sensitive	3.69E-04	1.40E-04	2.38E-04	1.37E-04	6.06E-04	4.61E-04	2.22E-04	6.82E-05	1.37E-04	6.06E-04
370,157	3,758,889	Sensitive	1.79E-04	8.18E-05	9.53E-05	1.21E-04	2.40E-04	1.36E-04	7.33E-05	4.21E-05	1.21E-04	2.40E-04
368,686	3,758,355	Sensitive	2.67E-04	2.21E-04	2.00E-04	2.67E-04	3.75E-04	1.83E-04	1.81E-04	9.26E-05	2.67E-04	3.75E-04
367,401	3,758,280	Sensitive	1.79E-04	1.87E-04	1.21E-04	2.35E-04	2.19E-04	9.54E-05	1.27E-04	4.05E-05	2.35E-04	2.35E-04
367,526	3,758,001	Sensitive	4.29E-04	3.32E-04	2.05E-04	4.25E-04	4.04E-04	1.93E-04	2.20E-04	6.55E-05	4.25E-04	4.29E-04
370,227	3,758,395	Sensitive	2.28E-04	9.80E-05	1.39E-04	1.01E-04	3.37E-04	2.27E-04	1.26E-04	4.18E-05	1.01E-04	3.37E-04
367,944	3,758,519	Sensitive	1.93E-04	1.32E-04	1.08E-04	1.62E-04	2.23E-04	1.21E-04	1.11E-04	5.24E-05	1.62E-04	2.23E-04
368,310	3,758,513	Sensitive	1.72E-04	1.49E-04	1.20E-04	1.81E-04	2.26E-04	1.08E-04	1.11E-04	4.78E-05	1.81E-04	2.26E-04
369,745	3,758,680	Sensitive	2.08E-04	1.06E-04	1.27E-04	1.49E-04	3.03E-04	1.79E-04	9.67E-05	6.58E-05	1.49E-04	3.03E-04
370,009	3,758,321	Sensitive	2.22E-04	1.20E-04	1.49E-04	1.07E-04	3.24E-04	2.08E-04	1.56E-04	4.67E-05	1.07E-04	3.24E-04
370,058	3,758,870	Sensitive	2.13E-04	8.91E-05	1.14E-04	1.37E-04	2.96E-04	1.80E-04	8.20E-05	5.03E-05	1.37E-04	2.96E-04

Table H.9-1 Operational Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
366,650	3,756,750	Worker	3.06E-03	9.78E-05
366,900	3,756,750	Worker	3.23E-03	1.03E-04
367,150	3,756,750	Worker	2.96E-03	9.49E-05
367,400	3,756,750	Worker	2.55E-03	8.17E-05
367,650	3,756,750	Worker	2.20E-03	7.03E-05
367,900	3,756,750	Worker	1.85E-03	5.94E-05
368,150	3,756,750	Worker	1.59E-03	5.10E-05
368,400	3,756,750	Worker	1.39E-03	4.44E-05
368,650	3,756,750	Worker	1.18E-03	3.78E-05
368,900	3,756,750	Worker	9.94E-04	3.18E-05
369,150	3,756,750	Worker	8.71E-04	2.79E-05
366,650	3,757,000	Worker	4.03E-03	1.29E-04
366,900	3,757,000	Worker	4.69E-03	1.50E-04
367,150	3,757,000	Worker	4.63E-03	1.48E-04
367,400	3,757,000	Worker	4.21E-03	1.35E-04
367,650	3,757,000	Worker	3.47E-03	1.11E-04
367,900	3,757,000	Worker	2.82E-03	9.03E-05
368,150	3,757,000	Worker	2.40E-03	7.67E-05
368,400	3,757,000	Worker	2.00E-03	6.41E-05
368,650	3,757,000	Worker	1.62E-03	5.18E-05
368,900	3,757,000	Worker	1.38E-03	4.41E-05
369,150	3,757,000	Worker	1.22E-03	3.91E-05
369,400	3,757,000	Worker	1.06E-03	3.40E-05
369,650	3,757,000	Worker	8.83E-04	2.83E-05
369,900	3,757,000	Worker	7.11E-04	2.28E-05
370,150	3,757,000	Worker	5.80E-04	1.86E-05
370,400	3,757,000	Worker	5.08E-04	1.63E-05
370,650	3,757,000	Worker	4.44E-04	1.42E-05
370,900	3,757,000	Worker	3.95E-04	1.26E-05
371,150	3,757,000	Worker	3.52E-04	1.13E-05
371,400	3,757,000	Worker	3.08E-04	9.86E-06
366,400	3,757,250	Worker	3.44E-03	1.10E-04
366,650	3,757,250	Worker	5.26E-03	1.68E-04
368,900	3,757,250	Worker	2.03E-03	6.51E-05
369,150	3,757,250	Worker	1.77E-03	5.67E-05
369,400	3,757,250	Worker	1.56E-03	4.99E-05
369,650	3,757,250	Worker	1.30E-03	4.16E-05
369,900	3,757,250	Worker	1.04E-03	3.32E-05
370,150	3,757,250	Worker	8.27E-04	2.65E-05
370,400	3,757,250	Worker	6.76E-04	2.16E-05
370,650	3,757,250	Worker	5.64E-04	1.81E-05
370,900	3,757,250	Worker	4.96E-04	1.59E-05
371,150	3,757,250	Worker	4.26E-04	1.37E-05
371,400	3,757,250	Worker	3.72E-04	1.19E-05
371,650	3,757,250	Worker	3.37E-04	1.08E-05
366,400	3,757,500	Worker	2.60E-03	8.32E-05
371,400	3,757,500	Worker	4.68E-04	1.50E-05
371,650	3,757,500	Worker	4.13E-04	1.32E-05
371,900	3,757,500	Worker	3.66E-04	1.17E-05
366,150	3,757,750	Worker	1.30E-03	4.16E-05

Table H.9-1 Operational Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
366,400	3,757,750	Residential	4.53E-03	6.06E-05
371,650	3,757,750	Worker	5.04E-04	1.61E-05
371,900	3,757,750	Worker	4.40E-04	1.41E-05
366,150	3,758,000	Residential	2.34E-03	3.12E-05
366,400	3,758,000	Residential	3.10E-03	4.14E-05
371,650	3,758,000	Worker	6.36E-04	2.04E-05
371,900	3,758,000	Worker	5.35E-04	1.71E-05
366,150	3,758,250	Residential	1.71E-03	2.28E-05
366,400	3,758,250	Residential	2.06E-03	2.76E-05
371,400	3,758,250	Residential	2.53E-03	3.38E-05
371,650	3,758,250	Residential	1.92E-03	2.56E-05
366,400	3,758,500	Residential	1.64E-03	2.19E-05
366,650	3,758,500	Residential	2.04E-03	2.72E-05
366,900	3,758,500	Residential	2.57E-03	3.43E-05
367,150	3,758,500	Residential	3.46E-03	4.62E-05
368,400	3,758,500	Residential	1.11E-02	1.48E-04
371,400	3,758,500	Sensitive	3.21E-03	4.28E-05
371,400	3,758,500	Worker	1.34E-03	4.28E-05
371,650	3,758,500	Residential	2.35E-03	3.14E-05
366,650	3,758,750	Residential	1.58E-03	2.11E-05
366,900	3,758,750	Residential	1.97E-03	2.64E-05
367,150	3,758,750	Residential	2.55E-03	3.41E-05
367,400	3,758,750	Residential	3.23E-03	4.31E-05
367,650	3,758,750	Residential	4.02E-03	5.37E-05
367,900	3,758,750	Residential	4.88E-03	6.51E-05
368,150	3,758,750	Residential	5.85E-03	7.82E-05
368,400	3,758,750	Residential	6.39E-03	8.54E-05
368,650	3,758,750	Residential	6.83E-03	9.13E-05
368,900	3,758,750	Worker	3.10E-03	9.94E-05
370,400	3,758,750	Residential	5.64E-03	7.53E-05
370,650	3,758,750	Residential	5.06E-03	6.76E-05
370,900	3,758,750	Residential	4.36E-03	5.83E-05
371,150	3,758,750	Residential	3.85E-03	5.14E-05
371,400	3,758,750	Residential	3.32E-03	4.44E-05
371,650	3,758,750	Residential	2.70E-03	3.61E-05
367,150	3,759,000	Residential	2.01E-03	2.69E-05
367,400	3,759,000	Residential	2.43E-03	3.24E-05
367,650	3,759,000	Residential	2.65E-03	3.54E-05
367,900	3,759,000	Residential	3.51E-03	4.69E-05
368,150	3,759,000	Residential	3.99E-03	5.33E-05
368,400	3,759,000	Residential	4.19E-03	5.59E-05
368,650	3,759,000	Residential	4.58E-03	6.13E-05
368,900	3,759,000	Residential	4.85E-03	6.48E-05
370,150	3,759,000	Residential	4.98E-03	6.66E-05
370,400	3,759,000	Residential	4.73E-03	6.32E-05
370,650	3,759,000	Residential	4.34E-03	5.79E-05
370,900	3,759,000	Residential	3.75E-03	5.01E-05
371,150	3,759,000	Residential	3.21E-03	4.30E-05
371,400	3,759,000	Residential	2.91E-03	3.89E-05
368,650	3,759,250	Residential	3.33E-03	4.45E-05

Table H.9-1 Operational Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
368,900	3,759,250	Residential	3.39E-03	4.53E-05
369,150	3,759,250	Residential	3.61E-03	4.82E-05
369,400	3,759,250	Residential	3.81E-03	5.09E-05
369,650	3,759,250	Residential	3.87E-03	5.17E-05
369,900	3,759,250	Residential	3.91E-03	5.23E-05
370,150	3,759,250	Residential	3.90E-03	5.21E-05
370,400	3,759,250	Residential	3.83E-03	5.12E-05
370,650	3,759,250	Residential	3.66E-03	4.89E-05
370,900	3,759,250	Residential	3.36E-03	4.49E-05
369,150	3,759,500	Residential	2.73E-03	3.65E-05
369,400	3,759,500	Residential	2.85E-03	3.81E-05
369,650	3,759,500	Residential	2.91E-03	3.89E-05
369,900	3,759,500	Residential	2.98E-03	3.98E-05
370,150	3,759,500	Residential	2.99E-03	4.00E-05
368,679	3,758,367	Sensitive	1.51E-02	2.01E-04
368,679	3,758,367	Worker	6.29E-03	2.01E-04
368,542	3,758,598	Sensitive	8.50E-03	1.14E-04
368,542	3,758,598	Worker	3.55E-03	1.14E-04
370,162	3,758,703	Sensitive	6.44E-03	8.61E-05
370,162	3,758,703	Worker	2.69E-03	8.61E-05
367,587	3,758,653	Sensitive	4.42E-03	5.91E-05
367,587	3,758,653	Worker	1.85E-03	5.91E-05
368,280	3,758,501	Sensitive	1.08E-02	1.44E-04
368,280	3,758,501	Worker	4.50E-03	1.44E-04
369,256	3,758,155	Sensitive	5.58E-02	7.45E-04
369,256	3,758,155	Worker	2.33E-02	7.45E-04
370,191	3,758,848	Sensitive	5.68E-03	7.58E-05
370,191	3,758,848	Worker	2.37E-03	7.58E-05
371,161	3,758,238	Sensitive	3.70E-03	4.95E-05
371,161	3,758,238	Worker	1.55E-03	4.95E-05
367,700	3,757,100	Worker	4.15E-03	1.33E-04
367,800	3,757,100	Worker	3.78E-03	1.21E-04
366,900	3,757,200	Worker	6.12E-03	1.96E-04
367,000	3,757,200	Worker	6.29E-03	2.01E-04
367,100	3,757,200	Worker	6.66E-03	2.13E-04
367,200	3,757,200	Worker	6.70E-03	2.14E-04
367,300	3,757,200	Worker	6.84E-03	2.19E-04
367,400	3,757,200	Worker	6.59E-03	2.11E-04
367,500	3,757,200	Worker	6.31E-03	2.02E-04
367,600	3,757,200	Worker	5.91E-03	1.89E-04
367,700	3,757,200	Worker	5.40E-03	1.73E-04
367,800	3,757,200	Worker	4.85E-03	1.55E-04
367,900	3,757,200	Worker	4.37E-03	1.40E-04
368,000	3,757,200	Worker	3.99E-03	1.28E-04
368,100	3,757,200	Worker	3.69E-03	1.18E-04
368,200	3,757,200	Worker	3.41E-03	1.09E-04
368,300	3,757,200	Worker	3.13E-03	1.00E-04
368,400	3,757,200	Worker	2.86E-03	9.16E-05
368,500	3,757,200	Worker	2.58E-03	8.25E-05
368,600	3,757,200	Worker	2.34E-03	7.48E-05

Table H.9-1 Operational Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
368,700	3,757,200	Worker	2.15E-03	6.88E-05
368,800	3,757,200	Worker	2.00E-03	6.41E-05
366,800	3,757,300	Worker	6.45E-03	2.06E-04
366,900	3,757,300	Worker	6.84E-03	2.19E-04
367,000	3,757,300	Worker	7.64E-03	2.45E-04
367,100	3,757,300	Worker	7.97E-03	2.55E-04
367,200	3,757,300	Worker	8.28E-03	2.65E-04
367,300	3,757,300	Worker	8.57E-03	2.74E-04
367,400	3,757,300	Worker	8.38E-03	2.68E-04
367,500	3,757,300	Worker	8.40E-03	2.69E-04
367,600	3,757,300	Worker	7.92E-03	2.54E-04
367,700	3,757,300	Worker	7.30E-03	2.34E-04
367,800	3,757,300	Worker	6.59E-03	2.11E-04
367,900	3,757,300	Worker	5.80E-03	1.86E-04
368,000	3,757,300	Worker	5.16E-03	1.65E-04
368,100	3,757,300	Worker	4.68E-03	1.50E-04
368,200	3,757,300	Worker	4.29E-03	1.37E-04
368,300	3,757,300	Worker	3.92E-03	1.26E-04
368,400	3,757,300	Worker	3.54E-03	1.13E-04
368,500	3,757,300	Worker	3.17E-03	1.02E-04
368,600	3,757,300	Worker	2.87E-03	9.20E-05
368,700	3,757,300	Worker	2.62E-03	8.37E-05
368,800	3,757,300	Worker	2.40E-03	7.67E-05
368,900	3,757,300	Worker	2.21E-03	7.09E-05
369,000	3,757,300	Worker	2.07E-03	6.63E-05
369,100	3,757,300	Worker	1.97E-03	6.30E-05
369,200	3,757,300	Worker	1.88E-03	6.01E-05
369,300	3,757,300	Worker	1.79E-03	5.73E-05
369,400	3,757,300	Worker	1.69E-03	5.42E-05
369,500	3,757,300	Worker	1.60E-03	5.11E-05
369,600	3,757,300	Worker	1.48E-03	4.75E-05
369,700	3,757,300	Worker	1.36E-03	4.36E-05
370,900	3,757,300	Worker	5.23E-04	1.67E-05
371,000	3,757,300	Worker	4.91E-04	1.57E-05
366,700	3,757,400	Worker	5.91E-03	1.89E-04
366,800	3,757,400	Worker	6.85E-03	2.19E-04
366,900	3,757,400	Worker	8.26E-03	2.65E-04
367,000	3,757,400	Worker	9.17E-03	2.94E-04
367,100	3,757,400	Worker	9.81E-03	3.14E-04
367,200	3,757,400	Worker	1.03E-02	3.31E-04
367,300	3,757,400	Worker	1.08E-02	3.45E-04
367,400	3,757,400	Worker	1.07E-02	3.43E-04
367,500	3,757,400	Worker	1.15E-02	3.67E-04
367,600	3,757,400	Worker	1.13E-02	3.61E-04
367,700	3,757,400	Worker	1.09E-02	3.49E-04
367,800	3,757,400	Worker	9.77E-03	3.13E-04
367,900	3,757,400	Worker	8.38E-03	2.68E-04
368,000	3,757,400	Worker	7.10E-03	2.27E-04
368,100	3,757,400	Worker	6.19E-03	1.98E-04
368,200	3,757,400	Worker	5.59E-03	1.79E-04

Table H.9-1 Operational Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
368,300	3,757,400	Worker	5.07E-03	1.62E-04
368,400	3,757,400	Worker	4.54E-03	1.45E-04
368,500	3,757,400	Worker	4.08E-03	1.31E-04
368,600	3,757,400	Worker	3.67E-03	1.17E-04
368,700	3,757,400	Worker	3.28E-03	1.05E-04
368,800	3,757,400	Worker	2.95E-03	9.45E-05
368,900	3,757,400	Worker	2.68E-03	8.58E-05
369,000	3,757,400	Worker	2.47E-03	7.91E-05
369,100	3,757,400	Worker	2.33E-03	7.45E-05
369,200	3,757,400	Worker	2.22E-03	7.10E-05
369,300	3,757,400	Worker	2.12E-03	6.77E-05
369,400	3,757,400	Worker	2.02E-03	6.45E-05
369,500	3,757,400	Worker	1.91E-03	6.12E-05
369,600	3,757,400	Worker	1.79E-03	5.72E-05
369,700	3,757,400	Worker	1.66E-03	5.30E-05
369,800	3,757,400	Worker	1.52E-03	4.87E-05
369,900	3,757,400	Worker	1.39E-03	4.45E-05
370,000	3,757,400	Worker	1.26E-03	4.04E-05
370,100	3,757,400	Worker	1.13E-03	3.63E-05
370,200	3,757,400	Worker	1.02E-03	3.26E-05
370,300	3,757,400	Worker	9.15E-04	2.93E-05
370,400	3,757,400	Worker	8.27E-04	2.65E-05
370,500	3,757,400	Worker	7.55E-04	2.42E-05
370,600	3,757,400	Worker	7.01E-04	2.24E-05
370,700	3,757,400	Worker	6.60E-04	2.11E-05
370,800	3,757,400	Worker	6.21E-04	1.99E-05
370,900	3,757,400	Worker	5.81E-04	1.86E-05
371,000	3,757,400	Worker	5.40E-04	1.73E-05
371,100	3,757,400	Worker	5.04E-04	1.61E-05
371,200	3,757,400	Worker	4.72E-04	1.51E-05
366,600	3,757,500	Worker	4.29E-03	1.37E-04
366,700	3,757,500	Worker	5.37E-03	1.72E-04
366,800	3,757,500	Worker	7.21E-03	2.31E-04
366,900	3,757,500	Worker	9.58E-03	3.07E-04
367,000	3,757,500	Worker	1.17E-02	3.75E-04
367,100	3,757,500	Worker	1.29E-02	4.12E-04
367,200	3,757,500	Worker	1.38E-02	4.40E-04
367,300	3,757,500	Worker	1.39E-02	4.46E-04
367,400	3,757,500	Worker	1.43E-02	4.57E-04
367,500	3,757,500	Worker	1.56E-02	5.00E-04
367,600	3,757,500	Worker	1.66E-02	5.30E-04
367,700	3,757,500	Worker	1.75E-02	5.61E-04
367,800	3,757,500	Worker	1.66E-02	5.31E-04
367,900	3,757,500	Worker	1.41E-02	4.52E-04
368,000	3,757,500	Worker	1.15E-02	3.67E-04
368,100	3,757,500	Worker	9.01E-03	2.88E-04
368,200	3,757,500	Worker	7.67E-03	2.46E-04
368,300	3,757,500	Worker	6.82E-03	2.18E-04
368,400	3,757,500	Worker	6.12E-03	1.96E-04
368,500	3,757,500	Worker	5.50E-03	1.76E-04

Table H.9-1 Operational Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
368,600	3,757,500	Worker	4.90E-03	1.57E-04
368,700	3,757,500	Worker	4.32E-03	1.38E-04
368,800	3,757,500	Worker	3.80E-03	1.22E-04
368,900	3,757,500	Worker	3.37E-03	1.08E-04
369,000	3,757,500	Worker	3.02E-03	9.68E-05
369,100	3,757,500	Worker	2.78E-03	8.91E-05
369,200	3,757,500	Worker	2.63E-03	8.42E-05
369,300	3,757,500	Worker	2.52E-03	8.07E-05
369,400	3,757,500	Worker	2.43E-03	7.76E-05
369,500	3,757,500	Worker	2.32E-03	7.42E-05
369,600	3,757,500	Worker	2.18E-03	6.98E-05
369,700	3,757,500	Worker	2.05E-03	6.55E-05
369,800	3,757,500	Worker	1.91E-03	6.10E-05
369,900	3,757,500	Worker	1.74E-03	5.59E-05
370,000	3,757,500	Worker	1.58E-03	5.04E-05
370,100	3,757,500	Worker	1.41E-03	4.51E-05
370,200	3,757,500	Worker	1.24E-03	3.98E-05
370,300	3,757,500	Worker	1.09E-03	3.50E-05
370,400	3,757,500	Worker	9.76E-04	3.12E-05
370,500	3,757,500	Worker	8.81E-04	2.82E-05
370,600	3,757,500	Worker	8.11E-04	2.60E-05
370,700	3,757,500	Worker	7.54E-04	2.41E-05
370,800	3,757,500	Worker	7.00E-04	2.24E-05
370,900	3,757,500	Worker	6.45E-04	2.07E-05
371,000	3,757,500	Worker	5.96E-04	1.91E-05
371,100	3,757,500	Worker	5.54E-04	1.77E-05
371,200	3,757,500	Worker	5.18E-04	1.66E-05
371,300	3,757,500	Worker	4.91E-04	1.57E-05
366,600	3,757,600	Worker	3.55E-03	1.14E-04
366,700	3,757,600	Worker	4.51E-03	1.44E-04
366,800	3,757,600	Worker	6.27E-03	2.01E-04
366,900	3,757,600	Worker	9.57E-03	3.06E-04
367,000	3,757,600	Worker	1.62E-02	5.17E-04
367,100	3,757,600	Worker	2.24E-02	7.18E-04
367,200	3,757,600	Worker	2.24E-02	7.18E-04
367,300	3,757,600	Worker	2.09E-02	6.69E-04
367,400	3,757,600	Worker	2.39E-02	7.64E-04
367,500	3,757,600	Worker	2.61E-02	8.35E-04
367,600	3,757,600	Worker	2.61E-02	8.36E-04
367,700	3,757,600	Worker	2.88E-02	9.23E-04
367,900	3,757,600	Worker	4.50E-02	1.44E-03
368,000	3,757,600	Worker	3.15E-02	1.01E-03
368,100	3,757,600	Worker	2.13E-02	6.81E-04
368,200	3,757,600	Worker	1.24E-02	3.96E-04
368,300	3,757,600	Worker	1.00E-02	3.20E-04
368,400	3,757,600	Worker	8.86E-03	2.84E-04
368,500	3,757,600	Worker	7.90E-03	2.53E-04
368,600	3,757,600	Worker	6.97E-03	2.23E-04
368,700	3,757,600	Worker	6.07E-03	1.94E-04
368,800	3,757,600	Worker	5.25E-03	1.68E-04

Table H.9-1 Operational Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
368,900	3,757,600	Worker	4.52E-03	1.45E-04
369,000	3,757,600	Worker	3.90E-03	1.25E-04
369,100	3,757,600	Worker	3.44E-03	1.10E-04
369,200	3,757,600	Worker	3.15E-03	1.01E-04
369,300	3,757,600	Worker	3.00E-03	9.62E-05
369,400	3,757,600	Worker	2.92E-03	9.35E-05
369,500	3,757,600	Worker	2.81E-03	9.01E-05
369,600	3,757,600	Worker	2.70E-03	8.63E-05
369,700	3,757,600	Worker	2.57E-03	8.21E-05
369,800	3,757,600	Worker	2.42E-03	7.73E-05
369,900	3,757,600	Worker	2.24E-03	7.16E-05
370,000	3,757,600	Worker	2.03E-03	6.51E-05
370,100	3,757,600	Worker	1.81E-03	5.78E-05
370,200	3,757,600	Worker	1.57E-03	5.02E-05
370,300	3,757,600	Worker	1.36E-03	4.34E-05
370,400	3,757,600	Worker	1.19E-03	3.80E-05
370,500	3,757,600	Worker	1.05E-03	3.38E-05
370,600	3,757,600	Worker	9.52E-04	3.05E-05
370,700	3,757,600	Worker	8.67E-04	2.77E-05
370,800	3,757,600	Worker	7.89E-04	2.53E-05
370,900	3,757,600	Worker	7.20E-04	2.30E-05
371,000	3,757,600	Worker	6.63E-04	2.12E-05
371,100	3,757,600	Worker	6.14E-04	1.96E-05
371,200	3,757,600	Worker	5.75E-04	1.84E-05
371,300	3,757,600	Worker	5.43E-04	1.74E-05
371,400	3,757,600	Worker	5.13E-04	1.64E-05
366,500	3,757,700	Residential	5.84E-03	7.80E-05
366,600	3,757,700	Worker	2.86E-03	9.15E-05
366,700	3,757,700	Worker	3.66E-03	1.17E-04
366,800	3,757,700	Worker	4.83E-03	1.54E-04
366,900	3,757,700	Worker	6.97E-03	2.23E-04
367,000	3,757,700	Worker	1.32E-02	4.23E-04
368,800	3,757,700	Worker	7.59E-03	2.43E-04
368,900	3,757,700	Worker	6.63E-03	2.12E-04
369,000	3,757,700	Worker	5.55E-03	1.78E-04
369,100	3,757,700	Worker	4.59E-03	1.47E-04
369,200	3,757,700	Worker	3.92E-03	1.26E-04
369,300	3,757,700	Worker	3.61E-03	1.16E-04
369,400	3,757,700	Worker	3.48E-03	1.11E-04
369,500	3,757,700	Worker	3.42E-03	1.09E-04
369,600	3,757,700	Worker	3.38E-03	1.08E-04
369,700	3,757,700	Worker	3.25E-03	1.04E-04
369,800	3,757,700	Worker	3.10E-03	9.94E-05
369,900	3,757,700	Worker	2.94E-03	9.40E-05
370,000	3,757,700	Worker	2.73E-03	8.73E-05
370,100	3,757,700	Worker	2.43E-03	7.77E-05
370,200	3,757,700	Worker	2.09E-03	6.68E-05
370,300	3,757,700	Worker	1.77E-03	5.68E-05
370,400	3,757,700	Worker	1.51E-03	4.85E-05
370,500	3,757,700	Worker	1.32E-03	4.21E-05

Table H.9-1 Operational Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
370,600	3,757,700	Worker	1.15E-03	3.67E-05
370,700	3,757,700	Worker	9.93E-04	3.18E-05
370,800	3,757,700	Worker	9.04E-04	2.89E-05
370,900	3,757,700	Worker	8.18E-04	2.62E-05
371,000	3,757,700	Worker	7.46E-04	2.39E-05
371,100	3,757,700	Worker	6.87E-04	2.20E-05
371,200	3,757,700	Worker	6.41E-04	2.05E-05
371,300	3,757,700	Worker	5.99E-04	1.92E-05
371,400	3,757,700	Worker	5.62E-04	1.80E-05
366,500	3,757,800	Residential	4.81E-03	6.42E-05
366,600	3,757,800	Residential	5.43E-03	7.25E-05
366,700	3,757,800	Residential	6.79E-03	9.07E-05
366,800	3,757,800	Residential	8.60E-03	1.15E-04
366,900	3,757,800	Worker	4.93E-03	1.58E-04
369,700	3,757,800	Worker	4.25E-03	1.36E-04
369,800	3,757,800	Worker	4.17E-03	1.33E-04
369,900	3,757,800	Worker	4.03E-03	1.29E-04
370,000	3,757,800	Worker	3.84E-03	1.23E-04
370,100	3,757,800	Worker	3.52E-03	1.13E-04
370,200	3,757,800	Worker	3.04E-03	9.74E-05
370,300	3,757,800	Worker	2.53E-03	8.09E-05
370,400	3,757,800	Worker	2.10E-03	6.72E-05
370,500	3,757,800	Worker	1.77E-03	5.67E-05
370,600	3,757,800	Worker	1.47E-03	4.70E-05
370,700	3,757,800	Worker	1.22E-03	3.90E-05
370,800	3,757,800	Worker	1.07E-03	3.44E-05
370,900	3,757,800	Worker	9.53E-04	3.05E-05
371,000	3,757,800	Worker	8.56E-04	2.74E-05
371,100	3,757,800	Worker	7.82E-04	2.50E-05
371,200	3,757,800	Worker	7.21E-04	2.31E-05
371,300	3,757,800	Worker	6.67E-04	2.14E-05
371,400	3,757,800	Worker	6.20E-04	1.99E-05
366,500	3,757,900	Residential	4.01E-03	5.36E-05
366,600	3,757,900	Residential	4.48E-03	5.98E-05
366,700	3,757,900	Residential	5.36E-03	7.17E-05
366,800	3,757,900	Residential	6.40E-03	8.55E-05
366,900	3,757,900	Residential	8.01E-03	1.07E-04
367,600	3,757,900	Sensitive	5.37E-02	7.17E-04
367,600	3,757,900	Worker	2.24E-02	7.17E-04
367,700	3,757,900	Sensitive	8.78E-02	1.17E-03
367,700	3,757,900	Worker	3.66E-02	1.17E-03
370,900	3,757,900	Worker	1.15E-03	3.68E-05
371,000	3,757,900	Sensitive	2.42E-03	3.23E-05
371,000	3,757,900	Worker	1.01E-03	3.23E-05
371,100	3,757,900	Worker	9.06E-04	2.90E-05
371,200	3,757,900	Worker	8.21E-04	2.63E-05
371,300	3,757,900	Worker	7.51E-04	2.40E-05
371,400	3,757,900	Worker	6.92E-04	2.22E-05
366,500	3,758,000	Residential	3.25E-03	4.35E-05
366,600	3,758,000	Residential	3.70E-03	4.95E-05

Table H.9-1 Operational Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
366,700	3,758,000	Residential	4.37E-03	5.84E-05
366,800	3,758,000	Residential	5.00E-03	6.67E-05
366,900	3,758,000	Residential	6.07E-03	8.12E-05
367,000	3,758,000	Residential	7.79E-03	1.04E-04
367,100	3,758,000	Residential	1.02E-02	1.36E-04
367,200	3,758,000	Residential	1.27E-02	1.69E-04
367,300	3,758,000	Residential	1.61E-02	2.15E-04
367,400	3,758,000	Residential	2.09E-02	2.80E-04
367,500	3,758,000	Sensitive	2.66E-02	3.55E-04
367,500	3,758,000	Worker	1.11E-02	3.55E-04
367,600	3,758,000	Sensitive	3.41E-02	4.56E-04
367,600	3,758,000	Worker	1.42E-02	4.56E-04
367,700	3,758,000	Sensitive	5.50E-02	7.35E-04
367,700	3,758,000	Worker	2.30E-02	7.35E-04
368,200	3,758,000	Residential	8.04E-02	1.07E-03
368,300	3,758,000	Residential	5.23E-02	6.99E-04
368,400	3,758,000	Residential	4.68E-02	6.25E-04
368,500	3,758,000	Residential	5.25E-02	7.02E-04
368,600	3,758,000	Residential	5.04E-02	6.73E-04
369,300	3,758,000	~~Worker~~ Residential	~~2.43E-02~~ 5.83E-02	7.79E-04
370,800	3,758,000	Worker	2.12E-03	6.80E-05
370,900	3,758,000	Worker	1.51E-03	4.85E-05
371,000	3,758,000	Worker	1.25E-03	4.00E-05
371,100	3,758,000	Worker	1.08E-03	3.46E-05
371,200	3,758,000	Residential	2.29E-03	3.06E-05
371,300	3,758,000	Worker	8.60E-04	2.75E-05
371,400	3,758,000	Worker	7.81E-04	2.50E-05
366,600	3,758,100	Residential	3.18E-03	4.25E-05
366,700	3,758,100	Residential	3.64E-03	4.87E-05
366,800	3,758,100	Residential	4.11E-03	5.50E-05
366,900	3,758,100	Residential	4.93E-03	6.59E-05
367,000	3,758,100	Residential	5.88E-03	7.86E-05
367,100	3,758,100	Residential	7.17E-03	9.58E-05
367,200	3,758,100	Residential	8.60E-03	1.15E-04
367,300	3,758,100	Residential	1.03E-02	1.38E-04
367,400	3,758,100	Residential	1.31E-02	1.75E-04
367,500	3,758,100	Residential	1.65E-02	2.20E-04
367,600	3,758,100	Sensitive	2.36E-02	3.15E-04
367,600	3,758,100	Worker	9.83E-03	3.15E-04
367,700	3,758,100	Sensitive	4.45E-02	5.94E-04
367,700	3,758,100	Worker	1.86E-02	5.94E-04
368,000	3,758,100	Residential	5.42E-02	7.24E-04
368,100	3,758,100	Residential	4.73E-02	6.32E-04
368,200	3,758,100	Residential	4.13E-02	5.52E-04
368,300	3,758,100	Residential	3.55E-02	4.75E-04
368,400	3,758,100	Residential	3.17E-02	4.24E-04
368,500	3,758,100	Residential	3.12E-02	4.17E-04
368,600	3,758,100	Residential	3.08E-02	4.12E-04
368,700	3,758,100	Residential	3.23E-02	4.32E-04

Table H.9-1 Operational Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
368,800	3,758,100	Residential	4.11E-02	5.50E-04
369,300	3,758,100	Worker	2.10E-02	6.73E-04
370,800	3,758,100	Worker	6.35E-03	2.03E-04
370,900	3,758,100	Worker	2.37E-03	7.58E-05
371,000	3,758,100	Sensitive	3.98E-03	5.32E-05
371,000	3,758,100	Worker	1.66E-03	5.32E-05
371,100	3,758,100	Worker	1.34E-03	4.28E-05
371,200	3,758,100	Residential	2.72E-03	3.63E-05
371,300	3,758,100	Residential	2.38E-03	3.18E-05
371,400	3,758,100	Residential	2.12E-03	2.83E-05
366,600	3,758,200	Residential	2.79E-03	3.72E-05
366,700	3,758,200	Residential	3.06E-03	4.10E-05
366,800	3,758,200	Residential	3.51E-03	4.70E-05
366,900	3,758,200	Residential	4.09E-03	5.47E-05
367,000	3,758,200	Residential	4.73E-03	6.32E-05
367,100	3,758,200	Residential	5.59E-03	7.47E-05
367,200	3,758,200	Residential	6.62E-03	8.85E-05
367,300	3,758,200	Residential	7.79E-03	1.04E-04
367,400	3,758,200	Residential	9.20E-03	1.23E-04
367,500	3,758,200	Residential	1.09E-02	1.46E-04
367,600	3,758,200	Residential	1.37E-02	1.83E-04
367,700	3,758,200	Residential	2.70E-02	3.61E-04
367,800	3,758,200	Worker	2.31E-02	7.39E-04
367,900	3,758,200	Sensitive	3.42E-02	4.57E-04
367,900	3,758,200	Worker	1.43E-02	4.57E-04
368,000	3,758,200	Sensitive	2.99E-02	3.99E-04
368,000	3,758,200	Worker	1.25E-02	3.99E-04
368,100	3,758,200	Residential	2.81E-02	3.75E-04
368,200	3,758,200	Residential	2.77E-02	3.70E-04
368,300	3,758,200	Residential	2.58E-02	3.45E-04
368,400	3,758,200	Residential	2.37E-02	3.17E-04
368,500	3,758,200	Residential	2.30E-02	3.07E-04
368,600	3,758,200	Residential	2.26E-02	3.02E-04
368,700	3,758,200	Residential	2.24E-02	2.99E-04
368,800	3,758,200	Residential	2.30E-02	3.07E-04
368,900	3,758,200	Residential	2.77E-02	3.71E-04
369,000	3,758,200	Worker	1.49E-02	4.78E-04
369,100	3,758,200	Worker	1.44E-02	4.59E-04
369,200	3,758,200	Worker	1.71E-02	5.48E-04
370,300	3,758,200	Sensitive	2.68E-02	3.59E-04
370,300	3,758,200	Worker	1.12E-02	3.59E-04
370,800	3,758,200	Worker	7.82E-03	2.50E-04
370,900	3,758,200	Worker	3.25E-03	1.04E-04
371,000	3,758,200	Worker	2.19E-03	7.00E-05
371,100	3,758,200	Worker	1.65E-03	5.30E-05
371,200	3,758,200	Residential	3.22E-03	4.31E-05
371,300	3,758,200	Residential	2.74E-03	3.66E-05
366,700	3,758,300	Residential	2.67E-03	3.57E-05
366,800	3,758,300	Residential	3.06E-03	4.09E-05
366,900	3,758,300	Residential	3.46E-03	4.62E-05

Table H.9-1 Operational Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
367,000	3,758,300	Residential	3.92E-03	5.24E-05
367,100	3,758,300	Residential	4.53E-03	6.05E-05
367,200	3,758,300	Residential	5.23E-03	6.99E-05
367,300	3,758,300	Residential	6.04E-03	8.07E-05
367,400	3,758,300	Sensitive	6.96E-03	9.30E-05
367,400	3,758,300	Worker	2.91E-03	9.30E-05
367,500	3,758,300	Worker	3.35E-03	1.07E-04
367,600	3,758,300	Residential	9.42E-03	1.26E-04
367,700	3,758,300	Residential	1.17E-02	1.56E-04
367,800	3,758,300	Sensitive	1.55E-02	2.07E-04
367,800	3,758,300	Worker	6.47E-03	2.07E-04
367,900	3,758,300	Sensitive	1.84E-02	2.45E-04
367,900	3,758,300	Worker	7.66E-03	2.45E-04
368,000	3,758,300	Sensitive	1.91E-02	2.55E-04
368,000	3,758,300	Worker	7.98E-03	2.55E-04
368,100	3,758,300	Sensitive	1.90E-02	2.54E-04
368,100	3,758,300	Worker	7.94E-03	2.54E-04
368,200	3,758,300	Residential	1.92E-02	2.57E-04
368,300	3,758,300	Residential	1.91E-02	2.55E-04
368,400	3,758,300	Residential	1.82E-02	2.43E-04
368,500	3,758,300	Residential	1.77E-02	2.36E-04
368,600	3,758,300	Sensitive	1.76E-02	2.36E-04
368,600	3,758,300	Worker	7.36E-03	2.36E-04
368,700	3,758,300	Sensitive	1.74E-02	2.33E-04
368,700	3,758,300	Worker	7.27E-03	2.33E-04
368,800	3,758,300	Residential	1.73E-02	2.31E-04
368,900	3,758,300	Residential	1.85E-02	2.47E-04
369,000	3,758,300	Worker	8.26E-03	2.64E-04
369,100	3,758,300	Worker	8.55E-03	2.74E-04
369,200	3,758,300	Worker	8.87E-03	2.84E-04
369,300	3,758,300	Worker	1.04E-02	3.34E-04
369,800	3,758,300	Residential	1.06E-02	1.42E-04
369,900	3,758,300	Residential	1.00E-02	1.34E-04
370,000	3,758,300	Residential	9.69E-03	1.29E-04
370,100	3,758,300	Residential	9.69E-03	1.29E-04
370,200	3,758,300	Residential	1.02E-02	1.36E-04
370,300	3,758,300	Residential	1.17E-02	1.57E-04
370,400	3,758,300	Residential	1.59E-02	2.12E-04
370,500	3,758,300	Residential	3.04E-02	4.06E-04
370,600	3,758,300	Residential	2.79E-02	3.73E-04
370,700	3,758,300	Residential	1.76E-02	2.35E-04
370,800	3,758,300	Residential	1.41E-02	1.88E-04
370,900	3,758,300	Worker	3.66E-03	1.17E-04
371,000	3,758,300	Worker	2.57E-03	8.24E-05
371,100	3,758,300	Worker	1.95E-03	6.25E-05
371,200	3,758,300	Sensitive	3.74E-03	4.99E-05
371,200	3,758,300	Worker	1.56E-03	4.99E-05
366,900	3,758,400	Residential	2.94E-03	3.93E-05
367,000	3,758,400	Residential	3.32E-03	4.44E-05
367,100	3,758,400	Residential	3.78E-03	5.05E-05

Table H.9-1 Operational Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
367,200	3,758,400	Residential	4.31E-03	5.76E-05
367,300	3,758,400	Residential	4.92E-03	6.57E-05
367,400	3,758,400	Residential	5.60E-03	7.48E-05
367,500	3,758,400	Worker	2.67E-03	8.54E-05
367,600	3,758,400	Residential	7.41E-03	9.90E-05
367,700	3,758,400	Residential	8.53E-03	1.14E-04
367,800	3,758,400	Sensitive	1.01E-02	1.35E-04
367,800	3,758,400	Worker	4.23E-03	1.35E-04
367,900	3,758,400	Sensitive	1.16E-02	1.54E-04
367,900	3,758,400	Worker	4.82E-03	1.54E-04
368,000	3,758,400	Sensitive	1.26E-02	1.69E-04
368,000	3,758,400	Worker	5.27E-03	1.69E-04
368,100	3,758,400	Sensitive	1.34E-02	1.80E-04
368,100	3,758,400	Worker	5.61E-03	1.80E-04
368,200	3,758,400	Residential	1.39E-02	1.86E-04
368,300	3,758,400	Residential	1.43E-02	1.91E-04
368,400	3,758,400	Residential	1.42E-02	1.89E-04
368,500	3,758,400	Residential	1.40E-02	1.87E-04
368,600	3,758,400	Sensitive	1.41E-02	1.88E-04
368,600	3,758,400	Worker	5.87E-03	1.88E-04
368,700	3,758,400	Sensitive	1.40E-02	1.88E-04
368,700	3,758,400	Worker	5.86E-03	1.88E-04
368,800	3,758,400	Residential	1.41E-02	1.89E-04
368,900	3,758,400	Worker	6.12E-03	1.96E-04
369,000	3,758,400	Worker	6.22E-03	1.99E-04
369,100	3,758,400	Worker	6.22E-03	1.99E-04
369,200	3,758,400	Worker	6.25E-03	2.00E-04
369,300	3,758,400	Worker	6.29E-03	2.01E-04
369,800	3,758,400	Residential	1.01E-02	1.35E-04
369,900	3,758,400	Residential	9.22E-03	1.23E-04
370,000	3,758,400	Residential	8.53E-03	1.14E-04
370,100	3,758,400	Residential	8.09E-03	1.08E-04
370,200	3,758,400	Residential	8.04E-03	1.07E-04
370,300	3,758,400	Residential	8.42E-03	1.12E-04
370,400	3,758,400	Residential	9.32E-03	1.24E-04
370,500	3,758,400	Residential	1.06E-02	1.41E-04
370,600	3,758,400	Residential	1.12E-02	1.50E-04
370,700	3,758,400	Residential	1.09E-02	1.46E-04
370,800	3,758,400	Residential	9.69E-03	1.30E-04
370,900	3,758,400	Worker	3.32E-03	1.06E-04
371,000	3,758,400	Worker	2.66E-03	8.52E-05
371,100	3,758,400	Worker	2.13E-03	6.82E-05
371,200	3,758,400	Worker	1.73E-03	5.55E-05
367,400	3,758,500	Residential	4.70E-03	6.28E-05
367,500	3,758,500	Worker	2.22E-03	7.11E-05
367,600	3,758,500	Worker	2.51E-03	8.02E-05
367,700	3,758,500	Worker	2.78E-03	8.89E-05
367,800	3,758,500	Worker	3.20E-03	1.03E-04
367,900	3,758,500	Sensitive	8.40E-03	1.12E-04
367,900	3,758,500	Worker	3.51E-03	1.12E-04

Table H.9-1 Operational Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
368,000	3,758,500	Sensitive	9.28E-03	1.24E-04
368,000	3,758,500	Worker	3.87E-03	1.24E-04
368,100	3,758,500	Sensitive	9.95E-03	1.33E-04
368,100	3,758,500	Worker	4.15E-03	1.33E-04
368,200	3,758,500	Sensitive	1.05E-02	1.40E-04
368,200	3,758,500	Worker	4.37E-03	1.40E-04
368,600	3,758,500	Residential	1.12E-02	1.49E-04
368,700	3,758,500	Residential	1.14E-02	1.52E-04
368,800	3,758,500	Worker	4.87E-03	1.56E-04
368,900	3,758,500	Worker	4.97E-03	1.59E-04
369,000	3,758,500	Worker	5.01E-03	1.60E-04
369,100	3,758,500	Worker	5.01E-03	1.60E-04
369,200	3,758,500	Worker	4.91E-03	1.57E-04
369,300	3,758,500	Worker	4.86E-03	1.56E-04
369,800	3,758,500	Residential	9.32E-03	1.25E-04
369,900	3,758,500	Residential	8.64E-03	1.15E-04
370,000	3,758,500	Residential	8.03E-03	1.07E-04
370,100	3,758,500	Residential	7.52E-03	1.01E-04
370,200	3,758,500	Residential	7.19E-03	9.61E-05
370,300	3,758,500	Residential	7.13E-03	9.53E-05
370,400	3,758,500	Residential	7.27E-03	9.71E-05
370,500	3,758,500	Residential	7.50E-03	1.00E-04
370,600	3,758,500	Residential	7.53E-03	1.01E-04
370,700	3,758,500	Residential	7.33E-03	9.80E-05
370,800	3,758,500	Residential	7.11E-03	9.50E-05
370,900	3,758,500	Worker	2.75E-03	8.81E-05
371,000	3,758,500	Worker	2.45E-03	7.85E-05
371,100	3,758,500	Worker	2.13E-03	6.81E-05
371,200	3,758,500	Worker	1.82E-03	5.81E-05
367,500	3,758,600	Residential	4.45E-03	5.95E-05
367,600	3,758,600	Residential	4.90E-03	6.55E-05
367,700	3,758,600	Sensitive	5.41E-03	7.22E-05
367,700	3,758,600	Worker	2.26E-03	7.22E-05
367,800	3,758,600	Worker	2.37E-03	7.59E-05
367,900	3,758,600	Worker	2.61E-03	8.34E-05
368,000	3,758,600	Sensitive	7.32E-03	9.78E-05
368,000	3,758,600	Worker	3.06E-03	9.78E-05
368,100	3,758,600	Sensitive	7.77E-03	1.04E-04
368,100	3,758,600	Worker	3.24E-03	1.04E-04
368,800	3,758,600	Worker	4.01E-03	1.28E-04
368,900	3,758,600	Worker	4.10E-03	1.31E-04
369,000	3,758,600	Worker	4.15E-03	1.33E-04
369,100	3,758,600	Worker	4.17E-03	1.33E-04
369,200	3,758,600	Worker	4.09E-03	1.31E-04
369,300	3,758,600	Worker	4.03E-03	1.29E-04
369,400	3,758,600	Residential	9.49E-03	1.27E-04
369,500	3,758,600	Residential	9.17E-03	1.23E-04
369,600	3,758,600	Residential	8.90E-03	1.19E-04
369,700	3,758,600	Residential	8.61E-03	1.15E-04
369,800	3,758,600	Residential	8.28E-03	1.11E-04

Table H.9-1 Operational Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
369,900	3,758,600	Residential	7.89E-03	1.05E-04
370,000	3,758,600	Residential	7.50E-03	1.00E-04
370,100	3,758,600	Residential	7.11E-03	9.50E-05
370,200	3,758,600	Residential	6.75E-03	9.02E-05
370,300	3,758,600	Residential	6.49E-03	8.67E-05
370,400	3,758,600	Residential	6.34E-03	8.47E-05
370,500	3,758,600	Residential	6.28E-03	8.39E-05
370,600	3,758,600	Residential	6.13E-03	8.19E-05
370,700	3,758,600	Residential	5.87E-03	7.84E-05
370,800	3,758,600	Residential	5.62E-03	7.51E-05
370,900	3,758,600	Residential	5.38E-03	7.18E-05
371,000	3,758,600	Worker	2.12E-03	6.78E-05
371,100	3,758,600	Residential	4.70E-03	6.28E-05
367,600	3,758,700	Residential	4.14E-03	5.54E-05
367,700	3,758,700	Residential	4.48E-03	5.99E-05
367,800	3,758,700	Residential	4.74E-03	6.34E-05
369,000	3,758,700	Residential	8.30E-03	1.11E-04
369,100	3,758,700	Residential	8.38E-03	1.12E-04
369,200	3,758,700	Residential	8.24E-03	1.10E-04
369,300	3,758,700	Residential	8.23E-03	1.10E-04
369,400	3,758,700	Residential	8.11E-03	1.08E-04
369,500	3,758,700	Residential	7.93E-03	1.06E-04
369,600	3,758,700	Residential	7.70E-03	1.03E-04
369,700	3,758,700	Residential	7.49E-03	1.00E-04
369,800	3,758,700	Residential	7.29E-03	9.74E-05
369,900	3,758,700	Residential	7.07E-03	9.45E-05
370,000	3,758,700	Residential	6.86E-03	9.16E-05
370,100	3,758,700	Residential	6.63E-03	8.86E-05
370,200	3,758,700	Sensitive	6.35E-03	8.48E-05
370,200	3,758,700	Worker	2.65E-03	8.48E-05
370,300	3,758,700	Residential	6.07E-03	8.11E-05
370,400	3,758,700	Residential	5.83E-03	7.79E-05
370,500	3,758,700	Residential	5.64E-03	7.53E-05
370,600	3,758,700	Residential	5.41E-03	7.23E-05
370,700	3,758,700	Residential	5.15E-03	6.89E-05
370,800	3,758,700	Residential	4.87E-03	6.50E-05
370,900	3,758,700	Residential	4.61E-03	6.16E-05
371,000	3,758,700	Worker	1.83E-03	5.86E-05
369,000	3,758,800	Residential	6.96E-03	9.30E-05
369,100	3,758,800	Residential	7.04E-03	9.41E-05
369,200	3,758,800	Residential	7.00E-03	9.35E-05
369,300	3,758,800	Residential	7.01E-03	9.37E-05
369,400	3,758,800	Residential	7.02E-03	9.38E-05
369,500	3,758,800	Residential	6.92E-03	9.24E-05
369,600	3,758,800	Residential	6.76E-03	9.04E-05
369,700	3,758,800	Residential	6.61E-03	8.83E-05
369,800	3,758,800	Residential	6.45E-03	8.63E-05
369,900	3,758,800	Residential	6.32E-03	8.44E-05
370,000	3,758,800	Residential	6.22E-03	8.31E-05
370,100	3,758,800	Residential	6.08E-03	8.13E-05

Table H.9-1 Operational Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
370,200	3,758,800	Sensitive	5.89E-03	7.87E-05
370,200	3,758,800	Worker	2.46E-03	7.87E-05
369,100	3,758,900	Residential	5.96E-03	7.97E-05
369,200	3,758,900	Residential	5.98E-03	7.99E-05
369,300	3,758,900	Residential	6.07E-03	8.11E-05
369,400	3,758,900	Residential	6.10E-03	8.16E-05
369,500	3,758,900	Residential	6.06E-03	8.10E-05
369,600	3,758,900	Residential	5.98E-03	7.99E-05
369,700	3,758,900	Residential	5.88E-03	7.86E-05
369,800	3,758,900	Residential	5.75E-03	7.68E-05
369,900	3,758,900	Residential	5.69E-03	7.60E-05
370,000	3,758,900	Residential	5.62E-03	7.51E-05
370,100	3,758,900	Residential	5.54E-03	7.40E-05
369,200	3,759,000	Residential	5.15E-03	6.88E-05
369,300	3,759,000	Residential	5.26E-03	7.02E-05
369,400	3,759,000	Residential	5.31E-03	7.10E-05
369,500	3,759,000	Residential	5.32E-03	7.11E-05
369,600	3,759,000	Residential	5.29E-03	7.07E-05
369,700	3,759,000	Residential	5.23E-03	6.99E-05
369,800	3,759,000	Residential	5.16E-03	6.90E-05
369,900	3,759,000	Residential	5.12E-03	6.85E-05
370,000	3,759,000	Residential	5.08E-03	6.79E-05
371,014	3,757,908	Sensitive	2.42E-03	3.23E-05
371,014	3,757,908	Worker	1.01E-03	3.23E-05
370,977	3,758,096	Sensitive	4.20E-03	5.61E-05
370,977	3,758,096	Worker	1.75E-03	5.61E-05
371,426	3,758,504	Sensitive	3.10E-03	4.14E-05
371,426	3,758,504	Worker	1.29E-03	4.14E-05
370,982	3,758,117	Sensitive	4.42E-03	5.90E-05
370,982	3,758,117	Worker	1.84E-03	5.90E-05
370,977	3,758,085	Sensitive	4.04E-03	5.40E-05
370,977	3,758,085	Worker	1.69E-03	5.40E-05
367,771	3,758,595	Sensitive	5.67E-03	7.58E-05
367,771	3,758,595	Worker	2.37E-03	7.58E-05
371,007	3,758,088	Sensitive	3.77E-03	5.04E-05
371,007	3,758,088	Worker	1.57E-03	5.04E-05
367,714	3,758,610	Sensitive	5.37E-03	7.18E-05
367,714	3,758,610	Worker	2.24E-03	7.18E-05
370,224	3,758,180	Sensitive	1.97E-02	2.63E-04
370,224	3,758,180	Worker	8.21E-03	2.63E-04
370,157	3,758,889	Sensitive	5.52E-03	7.38E-05
370,157	3,758,889	Worker	2.31E-03	7.38E-05
368,686	3,758,355	Sensitive	1.55E-02	2.07E-04
368,686	3,758,355	Worker	6.46E-03	2.07E-04
367,401	3,758,280	Sensitive	7.32E-03	9.79E-05
367,401	3,758,280	Worker	3.06E-03	9.79E-05
367,526	3,758,001	Sensitive	2.77E-02	3.70E-04
367,526	3,758,001	Worker	1.15E-02	3.70E-04
370,227	3,758,395	Sensitive	8.17E-03	1.09E-04
370,227	3,758,395	Worker	3.41E-03	1.09E-04

Table H.9-1 Operational Cancer Risk and Chronic Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
367,944	3,758,519	Sensitive	8.37E-03	1.12E-04
367,944	3,758,519	Worker	3.50E-03	1.12E-04
368,310	3,758,513	Sensitive	1.05E-02	1.41E-04
368,310	3,758,513	Worker	4.40E-03	1.41E-04
369,745	3,758,680	Sensitive	7.60E-03	1.02E-04
369,745	3,758,680	Worker	3.17E-03	1.02E-04
370,009	3,758,321	Sensitive	9.29E-03	1.24E-04
370,009	3,758,321	Worker	3.88E-03	1.24E-04
370,058	3,758,870	Sensitive	5.74E-03	7.68E-05
370,058	3,758,870	Worker	2.40E-03	7.68E-05

Table H.9-2 Operational Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
369,783	3,757,810	Fenceline	2.39E-04
369,684	3,757,799	Fenceline	2.42E-04
366,650	3,756,750	Worker	7.23E-05
366,900	3,756,750	Worker	8.25E-05
367,150	3,756,750	Worker	8.57E-05
367,400	3,756,750	Worker	8.21E-05
367,650	3,756,750	Worker	8.52E-05
367,900	3,756,750	Worker	8.66E-05
368,150	3,756,750	Worker	8.77E-05
368,400	3,756,750	Worker	9.56E-05
368,650	3,756,750	Worker	1.01E-04
368,900	3,756,750	Worker	1.05E-04
369,150	3,756,750	Worker	1.03E-04
366,400	3,757,000	OpenWater	7.71E-05
366,650	3,757,000	Worker	8.34E-05
366,900	3,757,000	Worker	9.24E-05
367,150	3,757,000	Worker	1.00E-04
367,400	3,757,000	Worker	1.04E-04
367,650	3,757,000	Worker	1.02E-04
367,900	3,757,000	Worker	1.01E-04
368,150	3,757,000	Worker	1.05E-04
368,400	3,757,000	Worker	1.06E-04
368,650	3,757,000	Worker	1.16E-04
368,900	3,757,000	Worker	1.19E-04
369,150	3,757,000	Worker	1.24E-04
369,400	3,757,000	Worker	1.17E-04
369,650	3,757,000	Worker	1.23E-04
369,900	3,757,000	Worker	1.15E-04
370,150	3,757,000	Worker	1.09E-04
370,400	3,757,000	Worker	1.00E-04
370,650	3,757,000	Worker	9.10E-05
370,900	3,757,000	Worker	9.32E-05
371,150	3,757,000	Worker	8.32E-05
371,400	3,757,000	Worker	7.75E-05
366,400	3,757,250	Worker	9.68E-05
366,650	3,757,250	Worker	1.05E-04
368,900	3,757,250	Worker	1.51E-04
369,150	3,757,250	Worker	1.46E-04
369,400	3,757,250	Worker	1.47E-04
369,650	3,757,250	Worker	1.44E-04
369,900	3,757,250	Worker	1.40E-04
370,150	3,757,250	Worker	1.31E-04
370,400	3,757,250	Worker	1.16E-04
370,650	3,757,250	Worker	1.03E-04
370,900	3,757,250	Worker	9.50E-05
371,150	3,757,250	Worker	8.66E-05
371,400	3,757,250	Worker	8.45E-05
371,650	3,757,250	Worker	7.62E-05
366,150	3,757,500	OpenWater	1.47E-04
366,400	3,757,500	Worker	1.62E-04

Table H.9-2 Operational Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
371,400	3,757,500	Worker	9.15E-05
371,650	3,757,500	Worker	8.49E-05
371,900	3,757,500	Worker	7.88E-05
366,150	3,757,750	Worker	1.54E-04
366,400	3,757,750	Residential	1.93E-04
371,650	3,757,750	Worker	8.98E-05
371,900	3,757,750	Worker	8.07E-05
366,150	3,758,000	Residential	1.30E-04
366,400	3,758,000	Residential	1.48E-04
371,650	3,758,000	Worker	9.82E-05
371,900	3,758,000	Worker	8.97E-05
366,150	3,758,250	Residential	9.53E-05
366,400	3,758,250	Residential	1.07E-04
371,400	3,758,250	Residential	1.22E-04
371,650	3,758,250	Residential	1.04E-04
366,400	3,758,500	Residential	9.35E-05
366,650	3,758,500	Residential	9.41E-05
366,900	3,758,500	Residential	1.11E-04
367,150	3,758,500	Residential	1.18E-04
368,400	3,758,500	Residential	1.29E-04
371,400	3,758,500	Sensitive	1.10E-04
371,650	3,758,500	Residential	9.80E-05
366,650	3,758,750	Residential	8.87E-05
366,900	3,758,750	Residential	8.33E-05
367,150	3,758,750	Residential	9.55E-05
367,400	3,758,750	Residential	1.06E-04
367,650	3,758,750	Residential	9.63E-05
367,900	3,758,750	Residential	1.04E-04
368,150	3,758,750	Residential	1.01E-04
368,400	3,758,750	Residential	1.07E-04
368,650	3,758,750	Residential	1.14E-04
368,900	3,758,750	Worker	1.22E-04
370,400	3,758,750	Residential	1.09E-04
370,650	3,758,750	Residential	1.13E-04
370,900	3,758,750	Residential	1.01E-04
371,150	3,758,750	Residential	1.03E-04
371,400	3,758,750	Residential	9.03E-05
371,650	3,758,750	Residential	8.18E-05
367,150	3,759,000	Residential	8.04E-05
367,400	3,759,000	Residential	8.61E-05
367,650	3,759,000	Residential	8.41E-05
367,900	3,759,000	Residential	8.59E-05
368,150	3,759,000	Residential	8.98E-05
368,400	3,759,000	Residential	8.90E-05
368,650	3,759,000	Residential	8.86E-05
368,900	3,759,000	Residential	9.53E-05
370,150	3,759,000	Residential	9.41E-05
370,400	3,759,000	Residential	9.18E-05
370,650	3,759,000	Residential	9.15E-05
370,900	3,759,000	Residential	8.70E-05

Table H.9-2 Operational Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
371,150	3,759,000	Residential	8.71E-05
371,400	3,759,000	Residential	8.37E-05
368,650	3,759,250	Residential	8.27E-05
368,900	3,759,250	Residential	7.79E-05
369,150	3,759,250	Residential	8.39E-05
369,400	3,759,250	Residential	8.38E-05
369,650	3,759,250	Residential	8.43E-05
369,900	3,759,250	Residential	8.32E-05
370,150	3,759,250	Residential	7.91E-05
370,400	3,759,250	Residential	8.24E-05
370,650	3,759,250	Residential	8.03E-05
370,900	3,759,250	Residential	7.47E-05
369,150	3,759,500	Residential	7.30E-05
369,400	3,759,500	Residential	7.23E-05
369,650	3,759,500	Residential	7.21E-05
369,900	3,759,500	Residential	7.45E-05
370,150	3,759,500	Residential	7.24E-05
368,679	3,758,367	Sensitive	1.55E-04
368,542	3,758,598	Sensitive	1.22E-04
370,162	3,758,703	Sensitive	1.16E-04
367,587	3,758,653	Sensitive	1.17E-04
368,280	3,758,501	Sensitive	1.23E-04
369,256	3,758,155	Sensitive	3.19E-04
370,191	3,758,848	Sensitive	1.05E-04
371,161	3,758,238	Sensitive	1.38E-04
367,700	3,757,100	Worker	1.12E-04
367,800	3,757,100	Worker	1.11E-04
366,900	3,757,200	Worker	1.11E-04
367,000	3,757,200	Worker	1.18E-04
367,100	3,757,200	Worker	1.18E-04
367,200	3,757,200	Worker	1.15E-04
367,300	3,757,200	Worker	1.20E-04
367,400	3,757,200	Worker	1.23E-04
367,500	3,757,200	Worker	1.23E-04
367,600	3,757,200	Worker	1.18E-04
367,700	3,757,200	Worker	1.22E-04
367,800	3,757,200	Worker	1.23E-04
367,900	3,757,200	Worker	1.18E-04
368,000	3,757,200	Worker	1.22E-04
368,100	3,757,200	Worker	1.27E-04
368,200	3,757,200	Worker	1.31E-04
368,300	3,757,200	Worker	1.30E-04
368,400	3,757,200	Worker	1.35E-04
368,500	3,757,200	Worker	1.34E-04
368,600	3,757,200	Worker	1.39E-04
368,700	3,757,200	Worker	1.42E-04
368,800	3,757,200	Worker	1.40E-04
366,800	3,757,300	Worker	1.16E-04
366,900	3,757,300	Worker	1.21E-04
367,000	3,757,300	Worker	1.27E-04

Table H.9-2 Operational Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
367,100	3,757,300	Worker	1.27E-04
367,200	3,757,300	Worker	1.35E-04
367,300	3,757,300	Worker	1.36E-04
367,400	3,757,300	Worker	1.37E-04
367,500	3,757,300	Worker	1.41E-04
367,600	3,757,300	Worker	1.34E-04
367,700	3,757,300	Worker	1.35E-04
367,800	3,757,300	Worker	1.35E-04
367,900	3,757,300	Worker	1.30E-04
368,000	3,757,300	Worker	1.35E-04
368,100	3,757,300	Worker	1.41E-04
368,200	3,757,300	Worker	1.43E-04
368,300	3,757,300	Worker	1.50E-04
368,400	3,757,300	Worker	1.48E-04
368,500	3,757,300	Worker	1.55E-04
368,600	3,757,300	Worker	1.54E-04
368,700	3,757,300	Worker	1.53E-04
368,800	3,757,300	Worker	1.59E-04
368,900	3,757,300	Worker	1.57E-04
369,000	3,757,300	Worker	1.60E-04
369,100	3,757,300	Worker	1.53E-04
369,200	3,757,300	Worker	1.54E-04
369,300	3,757,300	Worker	1.54E-04
369,400	3,757,300	Worker	1.51E-04
369,500	3,757,300	Worker	1.58E-04
369,600	3,757,300	Worker	1.52E-04
369,700	3,757,300	Worker	1.50E-04
370,900	3,757,300	Worker	9.87E-05
371,000	3,757,300	Worker	9.58E-05
366,700	3,757,400	Worker	1.36E-04
366,800	3,757,400	Worker	1.34E-04
366,900	3,757,400	Worker	1.35E-04
367,000	3,757,400	Worker	1.35E-04
367,100	3,757,400	Worker	1.38E-04
367,200	3,757,400	Worker	1.55E-04
367,300	3,757,400	Worker	1.62E-04
367,400	3,757,400	Worker	1.58E-04
367,500	3,757,400	Worker	1.65E-04
367,600	3,757,400	Worker	1.63E-04
367,700	3,757,400	Worker	1.69E-04
367,800	3,757,400	Worker	1.59E-04
367,900	3,757,400	Worker	1.53E-04
368,000	3,757,400	Worker	1.52E-04
368,100	3,757,400	Worker	1.60E-04
368,200	3,757,400	Worker	1.62E-04
368,300	3,757,400	Worker	1.62E-04
368,400	3,757,400	Worker	1.72E-04
368,500	3,757,400	Worker	1.78E-04
368,600	3,757,400	Worker	1.74E-04
368,700	3,757,400	Worker	1.80E-04

Table H.9-2 Operational Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
368,800	3,757,400	Worker	1.75E-04
368,900	3,757,400	Worker	1.74E-04
369,000	3,757,400	Worker	1.82E-04
369,100	3,757,400	Worker	1.78E-04
369,200	3,757,400	Worker	1.72E-04
369,300	3,757,400	Worker	1.70E-04
369,400	3,757,400	Worker	1.69E-04
369,500	3,757,400	Worker	1.70E-04
369,600	3,757,400	Worker	1.68E-04
369,700	3,757,400	Worker	1.70E-04
369,800	3,757,400	Worker	1.61E-04
369,900	3,757,400	Worker	1.54E-04
370,000	3,757,400	Worker	1.50E-04
370,100	3,757,400	Worker	1.42E-04
370,200	3,757,400	Worker	1.34E-04
370,300	3,757,400	Worker	1.33E-04
370,400	3,757,400	Worker	1.22E-04
370,500	3,757,400	Worker	1.20E-04
370,600	3,757,400	Worker	1.15E-04
370,700	3,757,400	Worker	1.12E-04
370,800	3,757,400	Worker	1.08E-04
370,900	3,757,400	Worker	1.06E-04
371,000	3,757,400	Worker	1.04E-04
371,100	3,757,400	Worker	1.02E-04
371,200	3,757,400	Worker	9.64E-05
366,600	3,757,500	Worker	1.78E-04
366,700	3,757,500	Worker	1.80E-04
366,800	3,757,500	Worker	1.80E-04
366,900	3,757,500	Worker	1.78E-04
367,000	3,757,500	Worker	1.72E-04
367,100	3,757,500	Worker	1.68E-04
367,200	3,757,500	Worker	1.69E-04
367,300	3,757,500	Worker	1.76E-04
367,400	3,757,500	Worker	1.88E-04
367,500	3,757,500	Worker	2.12E-04
367,600	3,757,500	Worker	2.12E-04
367,700	3,757,500	Worker	2.12E-04
367,800	3,757,500	Worker	2.03E-04
367,900	3,757,500	Worker	1.95E-04
368,000	3,757,500	Worker	1.98E-04
368,100	3,757,500	Worker	1.98E-04
368,200	3,757,500	Worker	2.01E-04
368,300	3,757,500	Worker	2.02E-04
368,400	3,757,500	Worker	2.01E-04
368,500	3,757,500	Worker	2.01E-04
368,600	3,757,500	Worker	2.11E-04
368,700	3,757,500	Worker	2.05E-04
368,800	3,757,500	Worker	2.08E-04
368,900	3,757,500	Worker	2.15E-04
369,000	3,757,500	Worker	2.04E-04

Table H.9-2 Operational Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
369,100	3,757,500	Worker	1.98E-04
369,200	3,757,500	Worker	1.96E-04
369,300	3,757,500	Worker	1.95E-04
369,400	3,757,500	Worker	1.92E-04
369,500	3,757,500	Worker	1.90E-04
369,600	3,757,500	Worker	1.87E-04
369,700	3,757,500	Worker	1.84E-04
369,800	3,757,500	Worker	1.75E-04
369,900	3,757,500	Worker	1.64E-04
370,000	3,757,500	Worker	1.61E-04
370,100	3,757,500	Worker	1.64E-04
370,200	3,757,500	Worker	1.56E-04
370,300	3,757,500	Worker	1.51E-04
370,400	3,757,500	Worker	1.45E-04
370,500	3,757,500	Worker	1.38E-04
370,600	3,757,500	Worker	1.35E-04
370,700	3,757,500	Worker	1.27E-04
370,800	3,757,500	Worker	1.20E-04
370,900	3,757,500	Worker	1.16E-04
371,000	3,757,500	Worker	1.11E-04
371,100	3,757,500	Worker	1.05E-04
371,200	3,757,500	Worker	1.01E-04
371,300	3,757,500	Worker	9.70E-05
366,600	3,757,600	Worker	2.15E-04
366,700	3,757,600	Worker	2.38E-04
366,800	3,757,600	Worker	2.61E-04
366,900	3,757,600	Worker	2.72E-04
367,000	3,757,600	Worker	2.73E-04
367,100	3,757,600	Worker	2.77E-04
367,200	3,757,600	Worker	2.78E-04
367,300	3,757,600	Worker	2.66E-04
367,400	3,757,600	Worker	2.57E-04
367,500	3,757,600	Worker	2.50E-04
367,600	3,757,600	Worker	2.64E-04
367,700	3,757,600	Worker	3.22E-04
367,900	3,757,600	Worker	3.51E-04
368,000	3,757,600	Worker	3.25E-04
368,100	3,757,600	Worker	3.12E-04
368,200	3,757,600	Worker	3.01E-04
368,300	3,757,600	Worker	2.89E-04
368,400	3,757,600	Worker	2.75E-04
368,500	3,757,600	Worker	2.69E-04
368,600	3,757,600	Worker	2.59E-04
368,700	3,757,600	Worker	2.68E-04
368,800	3,757,600	Worker	2.60E-04
368,900	3,757,600	Worker	2.62E-04
369,000	3,757,600	Worker	2.58E-04
369,100	3,757,600	Worker	2.48E-04
369,200	3,757,600	Worker	2.40E-04
369,300	3,757,600	Worker	2.36E-04

Table H.9-2 Operational Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
369,400	3,757,600	Worker	2.26E-04
369,500	3,757,600	Worker	2.16E-04
369,600	3,757,600	Worker	2.11E-04
369,700	3,757,600	Worker	2.09E-04
369,800	3,757,600	Worker	2.05E-04
369,900	3,757,600	Worker	1.99E-04
370,000	3,757,600	Worker	1.88E-04
370,100	3,757,600	Worker	1.84E-04
370,200	3,757,600	Worker	1.76E-04
370,300	3,757,600	Worker	1.70E-04
370,400	3,757,600	Worker	1.65E-04
370,500	3,757,600	Worker	1.58E-04
370,600	3,757,600	Worker	1.49E-04
370,700	3,757,600	Worker	1.44E-04
370,800	3,757,600	Worker	1.35E-04
370,900	3,757,600	Worker	1.31E-04
371,000	3,757,600	Worker	1.26E-04
371,100	3,757,600	Worker	1.22E-04
371,200	3,757,600	Worker	1.16E-04
371,300	3,757,600	Worker	1.13E-04
371,400	3,757,600	Worker	1.07E-04
366,500	3,757,700	Residential	2.21E-04
366,600	3,757,700	Worker	2.47E-04
366,700	3,757,700	Worker	2.75E-04
366,800	3,757,700	Worker	3.09E-04
366,900	3,757,700	Worker	3.53E-04
367,000	3,757,700	Worker	4.21E-04
368,800	3,757,700	Worker	2.89E-04
368,900	3,757,700	Worker	2.87E-04
369,000	3,757,700	Worker	2.91E-04
369,100	3,757,700	Worker	2.75E-04
369,200	3,757,700	Worker	2.59E-04
369,300	3,757,700	Worker	2.60E-04
369,400	3,757,700	Worker	2.49E-04
369,500	3,757,700	Worker	2.46E-04
369,600	3,757,700	Worker	2.37E-04
369,700	3,757,700	Worker	2.24E-04
369,800	3,757,700	Worker	2.14E-04
369,900	3,757,700	Worker	2.09E-04
370,000	3,757,700	Worker	1.99E-04
370,100	3,757,700	Worker	1.90E-04
370,200	3,757,700	Worker	1.83E-04
370,300	3,757,700	Worker	1.72E-04
370,400	3,757,700	Worker	1.63E-04
370,500	3,757,700	Worker	1.56E-04
370,600	3,757,700	Worker	1.47E-04
370,700	3,757,700	Worker	1.39E-04
370,800	3,757,700	Worker	1.36E-04
370,900	3,757,700	Worker	1.30E-04
371,000	3,757,700	Worker	1.27E-04

Table H.9-2 Operational Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
371,100	3,757,700	Worker	1.22E-04
371,200	3,757,700	Worker	1.16E-04
371,300	3,757,700	Worker	1.08E-04
371,400	3,757,700	Worker	1.04E-04
366,500	3,757,800	Residential	2.25E-04
366,600	3,757,800	Residential	2.39E-04
366,700	3,757,800	Residential	2.57E-04
366,800	3,757,800	Residential	2.68E-04
366,900	3,757,800	Worker	2.68E-04
369,700	3,757,800	Worker	2.42E-04
369,800	3,757,800	Worker	2.34E-04
369,900	3,757,800	Worker	2.20E-04
370,000	3,757,800	Worker	2.16E-04
370,100	3,757,800	Worker	2.07E-04
370,200	3,757,800	Worker	1.96E-04
370,300	3,757,800	Worker	1.86E-04
370,400	3,757,800	Worker	1.77E-04
370,500	3,757,800	Worker	1.66E-04
370,600	3,757,800	Worker	1.59E-04
370,700	3,757,800	Worker	1.50E-04
370,800	3,757,800	Worker	1.44E-04
370,900	3,757,800	Worker	1.36E-04
371,000	3,757,800	Worker	1.31E-04
371,100	3,757,800	Worker	1.24E-04
371,200	3,757,800	Worker	1.18E-04
371,300	3,757,800	Worker	1.12E-04
371,400	3,757,800	Worker	1.07E-04
366,500	3,757,900	Residential	1.80E-04
366,600	3,757,900	Residential	1.84E-04
366,700	3,757,900	Residential	1.91E-04
366,800	3,757,900	Residential	1.96E-04
366,900	3,757,900	Residential	1.98E-04
367,600	3,757,900	Sensitive	2.90E-04
367,700	3,757,900	Sensitive	3.57E-04
370,900	3,757,900	Worker	1.58E-04
371,000	3,757,900	Sensitive	1.47E-04
371,100	3,757,900	Worker	1.37E-04
371,200	3,757,900	Worker	1.28E-04
371,300	3,757,900	Worker	1.19E-04
371,400	3,757,900	Worker	1.13E-04
366,500	3,758,000	Residential	1.49E-04
366,600	3,758,000	Residential	1.53E-04
366,700	3,758,000	Residential	1.55E-04
366,800	3,758,000	Residential	1.56E-04
366,900	3,758,000	Residential	1.60E-04
367,000	3,758,000	Residential	1.70E-04
367,100	3,758,000	Residential	1.76E-04
367,200	3,758,000	Residential	1.83E-04
367,300	3,758,000	Residential	1.99E-04
367,400	3,758,000	Residential	2.20E-04

Table H.9-2 Operational Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
367,500	3,758,000	Sensitive	2.42E-04
367,600	3,758,000	Sensitive	2.68E-04
367,700	3,758,000	Sensitive	3.17E-04
368,200	3,758,000	Residential	2.88E-04
368,300	3,758,000	Residential	2.46E-04
368,400	3,758,000	Residential	2.43E-04
368,500	3,758,000	Residential	2.53E-04
368,600	3,758,000	Residential	2.66E-04
369,300	3,758,000	~~Worker~~ Residential	4.13E-04
370,800	3,758,000	Worker	1.80E-04
370,900	3,758,000	Worker	1.51E-04
371,000	3,758,000	Worker	1.38E-04
371,100	3,758,000	Worker	1.27E-04
371,200	3,758,000	Residential	1.19E-04
371,300	3,758,000	Worker	1.14E-04
371,400	3,758,000	Worker	1.09E-04
366,600	3,758,100	Residential	1.38E-04
366,700	3,758,100	Residential	1.45E-04
366,800	3,758,100	Residential	1.50E-04
366,900	3,758,100	Residential	1.58E-04
367,000	3,758,100	Residential	1.63E-04
367,100	3,758,100	Residential	1.67E-04
367,200	3,758,100	Residential	1.72E-04
367,300	3,758,100	Residential	1.77E-04
367,400	3,758,100	Residential	1.91E-04
367,500	3,758,100	Residential	2.06E-04
367,600	3,758,100	Sensitive	2.28E-04
367,700	3,758,100	Sensitive	2.74E-04
368,000	3,758,100	Residential	2.32E-04
368,100	3,758,100	Residential	2.19E-04
368,200	3,758,100	Residential	2.05E-04
368,300	3,758,100	Residential	2.02E-04
368,400	3,758,100	Residential	2.03E-04
368,500	3,758,100	Residential	2.08E-04
368,600	3,758,100	Residential	2.04E-04
368,700	3,758,100	Residential	2.17E-04
368,800	3,758,100	Residential	2.55E-04
369,300	3,758,100	Worker	3.48E-04
370,800	3,758,100	Worker	2.00E-04
370,900	3,758,100	Worker	1.70E-04
371,000	3,758,100	Sensitive	1.56E-04
371,100	3,758,100	Worker	1.45E-04
371,200	3,758,100	Residential	1.35E-04
371,300	3,758,100	Residential	1.26E-04
371,400	3,758,100	Residential	1.19E-04
366,600	3,758,200	Residential	1.18E-04
366,700	3,758,200	Residential	1.19E-04
366,800	3,758,200	Residential	1.26E-04
366,900	3,758,200	Residential	1.35E-04

Table H.9-2 Operational Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
367,000	3,758,200	Residential	1.41E-04
367,100	3,758,200	Residential	1.46E-04
367,200	3,758,200	Residential	1.56E-04
367,300	3,758,200	Residential	1.66E-04
367,400	3,758,200	Residential	1.75E-04
367,500	3,758,200	Residential	1.80E-04
367,600	3,758,200	Residential	2.14E-04
367,700	3,758,200	Residential	2.70E-04
367,800	3,758,200	Worker	2.61E-04
367,900	3,758,200	Sensitive	1.80E-04
368,000	3,758,200	Sensitive	1.70E-04
368,100	3,758,200	Residential	1.72E-04
368,200	3,758,200	Residential	1.76E-04
368,300	3,758,200	Residential	1.70E-04
368,400	3,758,200	Residential	1.73E-04
368,500	3,758,200	Residential	1.79E-04
368,600	3,758,200	Residential	1.87E-04
368,700	3,758,200	Residential	1.92E-04
368,800	3,758,200	Residential	2.06E-04
368,900	3,758,200	Residential	2.46E-04
369,000	3,758,200	Worker	3.14E-04
369,100	3,758,200	Worker	3.02E-04
369,200	3,758,200	Worker	3.03E-04
370,300	3,758,200	Sensitive	2.37E-04
370,800	3,758,200	Worker	1.98E-04
370,900	3,758,200	Worker	1.67E-04
371,000	3,758,200	Worker	1.55E-04
371,100	3,758,200	Worker	1.43E-04
371,200	3,758,200	Residential	1.33E-04
371,300	3,758,200	Residential	1.24E-04
366,700	3,758,300	Residential	1.16E-04
366,800	3,758,300	Residential	1.21E-04
366,900	3,758,300	Residential	1.26E-04
367,000	3,758,300	Residential	1.29E-04
367,100	3,758,300	Residential	1.33E-04
367,200	3,758,300	Residential	1.34E-04
367,300	3,758,300	Residential	1.47E-04
367,400	3,758,300	Sensitive	1.57E-04
367,500	3,758,300	Worker	1.71E-04
367,600	3,758,300	Residential	1.87E-04
367,700	3,758,300	Residential	1.88E-04
367,800	3,758,300	Sensitive	1.79E-04
367,900	3,758,300	Sensitive	1.55E-04
368,000	3,758,300	Sensitive	1.49E-04
368,100	3,758,300	Sensitive	1.48E-04
368,200	3,758,300	Residential	1.48E-04
368,300	3,758,300	Residential	1.54E-04
368,400	3,758,300	Residential	1.48E-04
368,500	3,758,300	Residential	1.55E-04
368,600	3,758,300	Sensitive	1.63E-04

Table H.9-2 Operational Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
368,700	3,758,300	Sensitive	1.77E-04
368,800	3,758,300	Residential	1.81E-04
368,900	3,758,300	Residential	1.98E-04
369,000	3,758,300	Worker	2.15E-04
369,100	3,758,300	Worker	2.39E-04
369,200	3,758,300	Worker	2.46E-04
369,300	3,758,300	Worker	2.36E-04
369,800	3,758,300	Residential	1.78E-04
369,900	3,758,300	Residential	1.71E-04
370,000	3,758,300	Residential	1.76E-04
370,100	3,758,300	Residential	1.76E-04
370,200	3,758,300	Residential	1.81E-04
370,300	3,758,300	Residential	1.80E-04
370,400	3,758,300	Residential	2.10E-04
370,500	3,758,300	Residential	2.33E-04
370,600	3,758,300	Residential	2.43E-04
370,700	3,758,300	Residential	2.13E-04
370,800	3,758,300	Residential	1.87E-04
370,900	3,758,300	Worker	1.61E-04
371,000	3,758,300	Worker	1.49E-04
371,100	3,758,300	Worker	1.40E-04
371,200	3,758,300	Sensitive	1.30E-04
366,900	3,758,400	Residential	1.07E-04
367,000	3,758,400	Residential	1.17E-04
367,100	3,758,400	Residential	1.29E-04
367,200	3,758,400	Residential	1.28E-04
367,300	3,758,400	Residential	1.36E-04
367,400	3,758,400	Residential	1.40E-04
367,500	3,758,400	Worker	1.55E-04
367,600	3,758,400	Residential	1.55E-04
367,700	3,758,400	Residential	1.51E-04
367,800	3,758,400	Sensitive	1.52E-04
367,900	3,758,400	Sensitive	1.38E-04
368,000	3,758,400	Sensitive	1.32E-04
368,100	3,758,400	Sensitive	1.35E-04
368,200	3,758,400	Residential	1.36E-04
368,300	3,758,400	Residential	1.40E-04
368,400	3,758,400	Residential	1.47E-04
368,500	3,758,400	Residential	1.48E-04
368,600	3,758,400	Sensitive	1.50E-04
368,700	3,758,400	Sensitive	1.53E-04
368,800	3,758,400	Residential	1.61E-04
368,900	3,758,400	Worker	1.69E-04
369,000	3,758,400	Worker	1.76E-04
369,100	3,758,400	Worker	1.84E-04
369,200	3,758,400	Worker	1.92E-04
369,300	3,758,400	Worker	2.05E-04
369,800	3,758,400	Residential	1.61E-04
369,900	3,758,400	Residential	1.52E-04
370,000	3,758,400	Residential	1.49E-04

Table H.9-2 Operational Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
370,100	3,758,400	Residential	1.50E-04
370,200	3,758,400	Residential	1.50E-04
370,300	3,758,400	Residential	1.53E-04
370,400	3,758,400	Residential	1.64E-04
370,500	3,758,400	Residential	1.68E-04
370,600	3,758,400	Residential	1.71E-04
370,700	3,758,400	Residential	1.78E-04
370,800	3,758,400	Residential	1.63E-04
370,900	3,758,400	Worker	1.58E-04
371,000	3,758,400	Worker	1.47E-04
371,100	3,758,400	Worker	1.35E-04
371,200	3,758,400	Worker	1.24E-04
367,400	3,758,500	Residential	1.33E-04
367,500	3,758,500	Worker	1.30E-04
367,600	3,758,500	Worker	1.30E-04
367,700	3,758,500	Worker	1.28E-04
367,800	3,758,500	Worker	1.33E-04
367,900	3,758,500	Sensitive	1.22E-04
368,000	3,758,500	Sensitive	1.24E-04
368,100	3,758,500	Sensitive	1.20E-04
368,200	3,758,500	Sensitive	1.22E-04
368,600	3,758,500	Residential	1.41E-04
368,700	3,758,500	Residential	1.38E-04
368,800	3,758,500	Worker	1.41E-04
368,900	3,758,500	Worker	1.53E-04
369,000	3,758,500	Worker	1.59E-04
369,100	3,758,500	Worker	1.59E-04
369,200	3,758,500	Worker	1.67E-04
369,300	3,758,500	Worker	1.65E-04
369,800	3,758,500	Residential	1.44E-04
369,900	3,758,500	Residential	1.41E-04
370,000	3,758,500	Residential	1.42E-04
370,100	3,758,500	Residential	1.38E-04
370,200	3,758,500	Residential	1.34E-04
370,300	3,758,500	Residential	1.35E-04
370,400	3,758,500	Residential	1.39E-04
370,500	3,758,500	Residential	1.43E-04
370,600	3,758,500	Residential	1.40E-04
370,700	3,758,500	Residential	1.38E-04
370,800	3,758,500	Residential	1.40E-04
370,900	3,758,500	Worker	1.36E-04
371,000	3,758,500	Worker	1.29E-04
371,100	3,758,500	Worker	1.27E-04
371,200	3,758,500	Worker	1.19E-04
367,500	3,758,600	Residential	1.17E-04
367,600	3,758,600	Residential	1.19E-04
367,700	3,758,600	Sensitive	1.16E-04
367,800	3,758,600	Worker	1.19E-04
367,900	3,758,600	Worker	1.10E-04
368,000	3,758,600	Sensitive	1.14E-04

Table H.9-2 Operational Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
368,100	3,758,600	Sensitive	1.15E-04
368,800	3,758,600	Worker	1.34E-04
368,900	3,758,600	Worker	1.34E-04
369,000	3,758,600	Worker	1.35E-04
369,100	3,758,600	Worker	1.42E-04
369,200	3,758,600	Worker	1.40E-04
369,300	3,758,600	Worker	1.44E-04
369,400	3,758,600	Residential	1.43E-04
369,500	3,758,600	Residential	1.45E-04
369,600	3,758,600	Residential	1.39E-04
369,700	3,758,600	Residential	1.36E-04
369,800	3,758,600	Residential	1.30E-04
369,900	3,758,600	Residential	1.33E-04
370,000	3,758,600	Residential	1.24E-04
370,100	3,758,600	Residential	1.26E-04
370,200	3,758,600	Residential	1.27E-04
370,300	3,758,600	Residential	1.31E-04
370,400	3,758,600	Residential	1.28E-04
370,500	3,758,600	Residential	1.26E-04
370,600	3,758,600	Residential	1.24E-04
370,700	3,758,600	Residential	1.24E-04
370,800	3,758,600	Residential	1.22E-04
370,900	3,758,600	Residential	1.20E-04
371,000	3,758,600	Worker	1.20E-04
371,100	3,758,600	Residential	1.14E-04
367,600	3,758,700	Residential	1.10E-04
367,700	3,758,700	Residential	1.07E-04
367,800	3,758,700	Residential	1.06E-04
369,000	3,758,700	Residential	1.20E-04
369,100	3,758,700	Residential	1.27E-04
369,200	3,758,700	Residential	1.28E-04
369,300	3,758,700	Residential	1.32E-04
369,400	3,758,700	Residential	1.29E-04
369,500	3,758,700	Residential	1.27E-04
369,600	3,758,700	Residential	1.21E-04
369,700	3,758,700	Residential	1.25E-04
369,800	3,758,700	Residential	1.22E-04
369,900	3,758,700	Residential	1.19E-04
370,000	3,758,700	Residential	1.18E-04
370,100	3,758,700	Residential	1.18E-04
370,200	3,758,700	Sensitive	1.13E-04
370,300	3,758,700	Residential	1.15E-04
370,400	3,758,700	Residential	1.15E-04
370,500	3,758,700	Residential	1.22E-04
370,600	3,758,700	Residential	1.17E-04
370,700	3,758,700	Residential	1.13E-04
370,800	3,758,700	Residential	1.10E-04
370,900	3,758,700	Residential	1.10E-04
371,000	3,758,700	Worker	1.07E-04
369,000	3,758,800	Residential	1.16E-04

Table H.9-2 Operational Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
369,100	3,758,800	Residential	1.15E-04
369,200	3,758,800	Residential	1.15E-04
369,300	3,758,800	Residential	1.13E-04
369,400	3,758,800	Residential	1.22E-04
369,500	3,758,800	Residential	1.10E-04
369,600	3,758,800	Residential	1.16E-04
369,700	3,758,800	Residential	1.12E-04
369,800	3,758,800	Residential	1.13E-04
369,900	3,758,800	Residential	1.08E-04
370,000	3,758,800	Residential	1.11E-04
370,100	3,758,800	Residential	1.07E-04
370,200	3,758,800	Sensitive	1.09E-04
369,100	3,758,900	Residential	1.10E-04
369,200	3,758,900	Residential	1.08E-04
369,300	3,758,900	Residential	1.05E-04
369,400	3,758,900	Residential	1.06E-04
369,500	3,758,900	Residential	1.12E-04
369,600	3,758,900	Residential	1.01E-04
369,700	3,758,900	Residential	1.04E-04
369,800	3,758,900	Residential	1.03E-04
369,900	3,758,900	Residential	1.05E-04
370,000	3,758,900	Residential	1.02E-04
370,100	3,758,900	Residential	1.01E-04
369,200	3,759,000	Residential	1.05E-04
369,300	3,759,000	Residential	1.00E-04
369,400	3,759,000	Residential	9.91E-05
369,500	3,759,000	Residential	9.99E-05
369,600	3,759,000	Residential	9.63E-05
369,700	3,759,000	Residential	9.41E-05
369,800	3,759,000	Residential	9.65E-05
369,900	3,759,000	Residential	9.68E-05
370,000	3,759,000	Residential	9.62E-05
370,755	3,757,840	Fenceline	1.61E-04
370,824	3,757,856	Fenceline	1.61E-04
370,910	3,757,807	Fenceline	1.37E-04
370,975	3,757,834	Fenceline	1.40E-04
370,900	3,757,862	Fenceline	1.57E-04
370,822	3,757,910	Fenceline	1.68E-04
370,796	3,758,005	Fenceline	1.84E-04
370,796	3,758,105	Fenceline	2.04E-04
370,797	3,758,205	Fenceline	1.99E-04
370,770	3,758,280	Fenceline	2.02E-04
370,670	3,758,281	Fenceline	2.29E-04
370,570	3,758,283	Fenceline	2.91E-04
370,470	3,758,284	Fenceline	2.73E-04
370,438	3,758,237	Fenceline	2.64E-04
370,358	3,758,203	Fenceline	2.91E-04
370,265	3,758,168	Fenceline	3.03E-04
370,227	3,758,230	Fenceline	2.05E-04
370,185	3,758,286	Fenceline	1.83E-04

Table H.9-2 Operational Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
370,085	3,758,282	Fenceline	1.82E-04
369,985	3,758,283	Fenceline	1.84E-04
369,885	3,758,284	Fenceline	1.80E-04
369,787	3,758,287	Fenceline	1.81E-04
369,788	3,758,387	Fenceline	1.64E-04
369,789	3,758,487	Fenceline	1.47E-04
369,783	3,758,580	Fenceline	1.33E-04
369,683	3,758,581	Fenceline	1.40E-04
369,583	3,758,582	Fenceline	1.40E-04
369,483	3,758,583	Fenceline	1.48E-04
369,388	3,758,579	Fenceline	1.48E-04
369,387	3,758,479	Fenceline	1.77E-04
369,386	3,758,379	Fenceline	2.07E-04
369,330	3,758,305	Fenceline	2.44E-04
369,253	3,758,241	Fenceline	2.78E-04
369,246	3,758,171	Fenceline	3.14E-04
369,310	3,758,094	Fenceline	3.51E-04
369,381	3,758,024	Fenceline	3.71E-04
369,344	3,757,941	Fenceline	4.50E-04
369,280	3,758,015	Fenceline	4.17E-04
369,216	3,758,092	Fenceline	3.83E-04
369,152	3,758,165	Fenceline	3.74E-04
369,067	3,758,112	Fenceline	4.06E-04
369,002	3,758,112	Fenceline	4.10E-04
368,949	3,758,161	Fenceline	3.65E-04
368,865	3,758,108	Fenceline	3.27E-04
368,780	3,758,055	Fenceline	3.04E-04
368,696	3,758,001	Fenceline	3.27E-04
368,608	3,757,953	Fenceline	3.61E-04
368,534	3,757,957	Fenceline	4.06E-04
368,441	3,757,965	Fenceline	3.40E-04
368,341	3,757,966	Fenceline	2.98E-04
368,241	3,757,977	Fenceline	3.07E-04
368,147	3,758,010	Fenceline	3.25E-04
368,055	3,758,049	Fenceline	2.74E-04
367,963	3,758,088	Fenceline	2.63E-04
367,871	3,758,128	Fenceline	2.96E-04
367,821	3,758,186	Fenceline	2.76E-04
367,730	3,758,221	Fenceline	3.00E-04
367,724	3,758,137	Fenceline	3.30E-04
367,741	3,758,039	Fenceline	3.71E-04
367,727	3,757,942	Fenceline	3.72E-04
367,704	3,757,849	Fenceline	3.92E-04
367,610	3,757,869	Fenceline	3.02E-04
367,528	3,757,879	Fenceline	2.89E-04
367,480	3,757,967	Fenceline	2.41E-04
367,412	3,757,986	Fenceline	2.23E-04
367,346	3,757,925	Fenceline	2.25E-04
367,257	3,757,913	Fenceline	2.18E-04
367,162	3,757,938	Fenceline	1.98E-04

Table H.9-2 Operational Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
367,072	3,757,944	Fenceline	1.95E-04
366,985	3,757,894	Fenceline	2.12E-04
366,976	3,757,823	Fenceline	2.69E-04
367,027	3,757,737	Fenceline	4.59E-04
367,076	3,757,650	Fenceline	5.35E-04
367,165	3,757,636	Fenceline	4.26E-04
367,265	3,757,638	Fenceline	3.99E-04
367,365	3,757,639	Fenceline	4.24E-04
367,465	3,757,640	Fenceline	4.50E-04
367,565	3,757,642	Fenceline	4.40E-04
367,665	3,757,648	Fenceline	4.25E-04
367,763	3,757,658	Fenceline	4.29E-04
367,795	3,757,593	Fenceline	4.10E-04
367,894	3,757,604	Fenceline	4.10E-04
367,994	3,757,615	Fenceline	4.50E-04
368,093	3,757,626	Fenceline	4.86E-04
368,192	3,757,637	Fenceline	5.28E-04
368,292	3,757,647	Fenceline	4.19E-04
368,391	3,757,658	Fenceline	3.79E-04
368,491	3,757,669	Fenceline	3.41E-04
368,590	3,757,680	Fenceline	3.28E-04
368,689	3,757,691	Fenceline	3.00E-04
368,789	3,757,702	Fenceline	2.88E-04
368,888	3,757,712	Fenceline	2.81E-04
368,988	3,757,723	Fenceline	2.74E-04
369,087	3,757,734	Fenceline	2.59E-04
369,186	3,757,745	Fenceline	2.50E-04
369,286	3,757,756	Fenceline	2.55E-04
369,385	3,757,767	Fenceline	2.58E-04
369,485	3,757,777	Fenceline	2.57E-04
369,584	3,757,788	Fenceline	2.51E-04
369,882	3,757,821	Fenceline	2.27E-04
369,982	3,757,832	Fenceline	2.26E-04
370,081	3,757,843	Fenceline	2.29E-04
370,181	3,757,847	Fenceline	2.20E-04
370,281	3,757,846	Fenceline	2.13E-04
370,381	3,757,845	Fenceline	2.02E-04
370,481	3,757,843	Fenceline	1.90E-04
370,581	3,757,842	Fenceline	1.82E-04
370,681	3,757,841	Fenceline	1.71E-04
371,014	3,757,908	Sensitive	1.46E-04
370,977	3,758,096	Sensitive	1.58E-04
371,426	3,758,504	Sensitive	1.08E-04
370,982	3,758,117	Sensitive	1.58E-04
370,977	3,758,085	Sensitive	1.55E-04
367,771	3,758,595	Sensitive	1.15E-04
371,007	3,758,088	Sensitive	1.52E-04
367,714	3,758,610	Sensitive	1.17E-04
370,224	3,758,180	Sensitive	2.48E-04
370,157	3,758,889	Sensitive	1.04E-04

Table H.9-2 Operational Acute Hazard Index at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
368,686	3,758,355	Sensitive	1.60E-04
367,401	3,758,280	Sensitive	1.62E-04
367,526	3,758,001	Sensitive	2.47E-04
370,227	3,758,395	Sensitive	1.51E-04
367,944	3,758,519	Sensitive	1.22E-04
368,310	3,758,513	Sensitive	1.24E-04
369,745	3,758,680	Sensitive	1.23E-04
370,009	3,758,321	Sensitive	1.67E-04
370,058	3,758,870	Sensitive	1.03E-04

Table H.10-1 Total Project Cancer Risk and Chronic Harzard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
366,650	3,756,750	Worker	0.033	2.18E-04
366,900	3,756,750	Worker	0.038	2.42E-04
367,150	3,756,750	Worker	0.041	2.48E-04
367,400	3,756,750	Worker	0.038	2.24E-04
367,650	3,756,750	Worker	0.036	2.08E-04
367,900	3,756,750	Worker	0.034	1.88E-04
368,150	3,756,750	Worker	0.031	1.69E-04
368,400	3,756,750	Worker	0.027	1.50E-04
368,650	3,756,750	Worker	0.024	1.32E-04
368,900	3,756,750	Worker	0.022	1.15E-04
369,150	3,756,750	Worker	0.019	1.02E-04
366,650	3,757,000	Worker	0.042	2.83E-04
366,900	3,757,000	Worker	0.053	3.45E-04
367,150	3,757,000	Worker	0.057	3.58E-04
367,400	3,757,000	Worker	0.059	3.55E-04
367,650	3,757,000	Worker	0.056	3.24E-04
367,900	3,757,000	Worker	0.051	2.86E-04
368,150	3,757,000	Worker	0.045	2.49E-04
368,400	3,757,000	Worker	0.039	2.13E-04
368,650	3,757,000	Worker	0.034	1.81E-04
368,900	3,757,000	Worker	0.029	1.56E-04
369,150	3,757,000	Worker	0.026	1.38E-04
369,400	3,757,000	Worker	0.023	1.21E-04
369,650	3,757,000	Worker	0.020	1.05E-04
369,900	3,757,000	Worker	0.018	9.19E-05
370,150	3,757,000	Worker	0.016	7.95E-05
370,400	3,757,000	Worker	0.014	6.93E-05
370,650	3,757,000	Worker	0.012	6.00E-05
370,900	3,757,000	Worker	0.010	5.18E-05
371,150	3,757,000	Worker	0.009	4.51E-05
371,400	3,757,000	Worker	0.008	3.93E-05
366,400	3,757,250	Worker	0.039	2.52E-04
366,650	3,757,250	Worker	0.056	3.72E-04
368,900	3,757,250	Worker	0.043	2.30E-04
369,150	3,757,250	Worker	0.037	1.98E-04
369,400	3,757,250	Worker	0.032	1.72E-04
369,650	3,757,250	Worker	0.028	1.49E-04
369,900	3,757,250	Worker	0.025	1.29E-04
370,150	3,757,250	Worker	0.022	1.11E-04
370,400	3,757,250	Worker	0.019	9.51E-05
370,650	3,757,250	Worker	0.016	7.98E-05
370,900	3,757,250	Worker	0.013	6.66E-05
371,150	3,757,250	Worker	0.011	5.54E-05
371,400	3,757,250	Worker	0.009	4.67E-05
371,650	3,757,250	Worker	0.008	4.04E-05
366,400	3,757,500	Worker	0.036	2.17E-04
371,400	3,757,500	Worker	0.011	5.74E-05
371,650	3,757,500	Worker	0.009	4.82E-05
371,900	3,757,500	Worker	0.008	4.19E-05

Table H.10-1 Total Project Cancer Risk and Chronic Harzard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
366,150	3,757,750	Worker	0.021	1.20E-04
366,400	3,757,750	Residential	0.024	1.73E-04
371,650	3,757,750	Worker	0.011	5.99E-05
371,900	3,757,750	Worker	0.009	5.05E-05
366,150	3,758,000	Residential	0.013	9.44E-05
366,400	3,758,000	Residential	0.017	1.25E-04
371,650	3,758,000	Worker	0.015	8.03E-05
371,900	3,758,000	Worker	0.012	6.40E-05
366,150	3,758,250	Residential	0.011	7.46E-05
366,400	3,758,250	Residential	0.012	8.63E-05
371,400	3,758,250	Residential	0.030	1.96E-04
371,650	3,758,250	Residential	0.018	1.22E-04
366,400	3,758,500	Residential	0.011	7.50E-05
366,650	3,758,500	Residential	0.014	9.57E-05
366,900	3,758,500	Residential	0.017	1.19E-04
367,150	3,758,500	Residential	0.023	1.62E-04
368,400	3,758,500	Residential	0.099	6.60E-04
371,400	3,758,500	Sensitive	0.044	2.80E-04
371,400	3,758,500	Worker	0.060	2.80E-04
371,650	3,758,500	Residential	0.027	1.78E-04
366,650	3,758,750	Residential	0.010	7.05E-05
366,900	3,758,750	Residential	0.013	9.24E-05
367,150	3,758,750	Residential	0.016	1.14E-04
367,400	3,758,750	Residential	0.018	1.29E-04
367,650	3,758,750	Residential	0.022	1.60E-04
367,900	3,758,750	Residential	0.028	1.99E-04
368,150	3,758,750	Residential	0.039	2.70E-04
368,400	3,758,750	Residential	0.048	3.30E-04
368,650	3,758,750	Residential	0.054	3.68E-04
368,900	3,758,750	Worker	0.079	4.04E-04
370,400	3,758,750	Residential	0.049	3.32E-04
370,650	3,758,750	Residential	0.048	3.17E-04
370,900	3,758,750	Residential	0.049	3.19E-04
371,150	3,758,750	Residential	0.047	3.04E-04
371,400	3,758,750	Residential	0.039	2.54E-04
371,650	3,758,750	Residential	0.030	1.98E-04
367,150	3,759,000	Residential	0.012	8.28E-05
367,400	3,759,000	Residential	0.013	9.28E-05
367,650	3,759,000	Residential	0.013	9.69E-05
367,900	3,759,000	Residential	0.019	1.36E-04
368,150	3,759,000	Residential	0.022	1.61E-04
368,400	3,759,000	Residential	0.026	1.84E-04
368,650	3,759,000	Residential	0.033	2.29E-04
368,900	3,759,000	Residential	0.036	2.49E-04
370,150	3,759,000	Residential	0.041	2.78E-04
370,400	3,759,000	Residential	0.038	2.59E-04
370,650	3,759,000	Residential	0.035	2.41E-04
370,900	3,759,000	Residential	0.033	2.23E-04
371,150	3,759,000	Residential	0.032	2.10E-04

Table H.10-1 Total Project Cancer Risk and Chronic Harzard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
371,400	3,759,000	Residential	0.030	1.99E-04
368,650	3,759,250	Residential	0.021	1.49E-04
368,900	3,759,250	Residential	0.023	1.59E-04
369,150	3,759,250	Residential	0.026	1.78E-04
369,400	3,759,250	Residential	0.029	1.97E-04
369,650	3,759,250	Residential	0.030	2.03E-04
369,900	3,759,250	Residential	0.031	2.11E-04
370,150	3,759,250	Residential	0.031	2.10E-04
370,400	3,759,250	Residential	0.030	2.04E-04
370,650	3,759,250	Residential	0.028	1.94E-04
370,900	3,759,250	Residential	0.027	1.84E-04
369,150	3,759,500	Residential	0.018	1.29E-04
369,400	3,759,500	Residential	0.021	1.42E-04
369,650	3,759,500	Residential	0.022	1.50E-04
369,900	3,759,500	Residential	0.023	1.58E-04
370,150	3,759,500	Residential	0.023	1.58E-04
368,679	3,758,367	Sensitive	0.139	9.26E-04
368,679	3,758,367	Worker	0.186	9.26E-04
368,542	3,758,598	Sensitive	0.072	4.83E-04
368,542	3,758,598	Worker	0.095	4.83E-04
370,162	3,758,703	Sensitive	0.058	3.87E-04
370,162	3,758,703	Worker	0.077	3.87E-04
367,587	3,758,653	Sensitive	0.025	1.82E-04
367,587	3,758,653	Worker	0.032	1.82E-04
368,280	3,758,501	Sensitive	0.094	6.34E-04
368,280	3,758,501	Worker	0.126	6.34E-04
369,256	3,758,155	Sensitive	0.821	5.23E-03
369,256	3,758,155	Worker	1.134	5.23E-03
370,191	3,758,848	Sensitive	0.048	3.26E-04
370,191	3,758,848	Worker	0.064	3.26E-04
371,161	3,758,238	Sensitive	0.064	4.03E-04
371,161	3,758,238	Worker	0.089	4.03E-04
367,700	3,757,100	Worker	0.069	3.95E-04
367,800	3,757,100	Worker	0.067	3.76E-04
366,900	3,757,200	Worker	0.078	4.86E-04
367,000	3,757,200	Worker	0.086	5.24E-04
367,100	3,757,200	Worker	0.080	5.08E-04
367,200	3,757,200	Worker	0.083	5.22E-04
367,300	3,757,200	Worker	0.089	5.50E-04
367,400	3,757,200	Worker	0.094	5.65E-04
367,500	3,757,200	Worker	0.093	5.51E-04
367,600	3,757,200	Worker	0.090	5.29E-04
367,700	3,757,200	Worker	0.089	5.13E-04
367,800	3,757,200	Worker	0.086	4.84E-04
367,900	3,757,200	Worker	0.082	4.52E-04
368,000	3,757,200	Worker	0.076	4.19E-04
368,100	3,757,200	Worker	0.070	3.87E-04
368,200	3,757,200	Worker	0.065	3.57E-04
368,300	3,757,200	Worker	0.060	3.28E-04

Table H.10-1 Total Project Cancer Risk and Chronic Harzard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
368,400	3,757,200	Worker	0.055	3.03E-04
368,500	3,757,200	Worker	0.051	2.79E-04
368,600	3,757,200	Worker	0.048	2.58E-04
368,700	3,757,200	Worker	0.045	2.41E-04
368,800	3,757,200	Worker	0.042	2.25E-04
366,800	3,757,300	Worker	0.081	5.06E-04
366,900	3,757,300	Worker	0.096	5.78E-04
367,000	3,757,300	Worker	0.093	5.88E-04
367,100	3,757,300	Worker	0.098	6.19E-04
367,200	3,757,300	Worker	0.106	6.58E-04
367,300	3,757,300	Worker	0.114	7.01E-04
367,400	3,757,300	Worker	0.123	7.33E-04
367,500	3,757,300	Worker	0.122	7.28E-04
367,600	3,757,300	Worker	0.119	7.01E-04
367,700	3,757,300	Worker	0.119	6.83E-04
367,800	3,757,300	Worker	0.118	6.60E-04
367,900	3,757,300	Worker	0.111	6.10E-04
368,000	3,757,300	Worker	0.102	5.55E-04
368,100	3,757,300	Worker	0.092	5.02E-04
368,200	3,757,300	Worker	0.082	4.53E-04
368,300	3,757,300	Worker	0.074	4.11E-04
368,400	3,757,300	Worker	0.068	3.73E-04
368,500	3,757,300	Worker	0.062	3.41E-04
368,600	3,757,300	Worker	0.058	3.14E-04
368,700	3,757,300	Worker	0.054	2.91E-04
368,800	3,757,300	Worker	0.050	2.70E-04
368,900	3,757,300	Worker	0.047	2.52E-04
369,000	3,757,300	Worker	0.044	2.36E-04
369,100	3,757,300	Worker	0.041	2.22E-04
369,200	3,757,300	Worker	0.039	2.09E-04
369,300	3,757,300	Worker	0.036	1.97E-04
369,400	3,757,300	Worker	0.034	1.86E-04
369,500	3,757,300	Worker	0.032	1.76E-04
369,600	3,757,300	Worker	0.031	1.66E-04
369,700	3,757,300	Worker	0.029	1.57E-04
370,900	3,757,300	Worker	0.014	7.06E-05
371,000	3,757,300	Worker	0.013	6.52E-05
366,700	3,757,400	Worker	0.073	4.59E-04
366,800	3,757,400	Worker	0.094	5.73E-04
366,900	3,757,400	Worker	0.103	6.46E-04
367,000	3,757,400	Worker	0.115	7.23E-04
367,100	3,757,400	Worker	0.128	7.91E-04
367,200	3,757,400	Worker	0.141	8.60E-04
367,300	3,757,400	Worker	0.154	9.23E-04
367,400	3,757,400	Worker	0.167	9.74E-04
367,500	3,757,400	Worker	0.169	1.00E-03
367,600	3,757,400	Worker	0.170	1.00E-03
367,700	3,757,400	Worker	0.178	1.03E-03
367,800	3,757,400	Worker	0.177	9.87E-04

Table H.10-1 Total Project Cancer Risk and Chronic Harzard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
367,900	3,757,400	Worker	0.165	9.01E-04
368,000	3,757,400	Worker	0.148	7.97E-04
368,100	3,757,400	Worker	0.129	6.94E-04
368,200	3,757,400	Worker	0.111	6.05E-04
368,300	3,757,400	Worker	0.097	5.33E-04
368,400	3,757,400	Worker	0.086	4.76E-04
368,500	3,757,400	Worker	0.079	4.32E-04
368,600	3,757,400	Worker	0.072	3.95E-04
368,700	3,757,400	Worker	0.067	3.63E-04
368,800	3,757,400	Worker	0.063	3.35E-04
368,900	3,757,400	Worker	0.058	3.10E-04
369,000	3,757,400	Worker	0.054	2.87E-04
369,100	3,757,400	Worker	0.050	2.67E-04
369,200	3,757,400	Worker	0.046	2.50E-04
369,300	3,757,400	Worker	0.043	2.34E-04
369,400	3,757,400	Worker	0.040	2.20E-04
369,500	3,757,400	Worker	0.038	2.08E-04
369,600	3,757,400	Worker	0.036	1.96E-04
369,700	3,757,400	Worker	0.035	1.86E-04
369,800	3,757,400	Worker	0.033	1.76E-04
369,900	3,757,400	Worker	0.032	1.68E-04
370,000	3,757,400	Worker	0.031	1.59E-04
370,100	3,757,400	Worker	0.029	1.50E-04
370,200	3,757,400	Worker	0.028	1.41E-04
370,300	3,757,400	Worker	0.026	1.32E-04
370,400	3,757,400	Worker	0.025	1.23E-04
370,500	3,757,400	Worker	0.023	1.13E-04
370,600	3,757,400	Worker	0.021	1.04E-04
370,700	3,757,400	Worker	0.019	9.60E-05
370,800	3,757,400	Worker	0.017	8.79E-05
370,900	3,757,400	Worker	0.016	8.02E-05
371,000	3,757,400	Worker	0.014	7.31E-05
371,100	3,757,400	Worker	0.013	6.69E-05
371,200	3,757,400	Worker	0.012	6.14E-05
366,600	3,757,500	Worker	0.055	3.42E-04
366,700	3,757,500	Worker	0.074	4.51E-04
366,800	3,757,500	Worker	0.093	5.77E-04
366,900	3,757,500	Worker	0.119	7.48E-04
367,000	3,757,500	Worker	0.151	9.39E-04
367,100	3,757,500	Worker	0.183	1.10E-03
367,200	3,757,500	Worker	0.212	1.24E-03
367,300	3,757,500	Worker	0.237	1.35E-03
367,400	3,757,500	Worker	0.245	1.39E-03
367,500	3,757,500	Worker	0.256	1.47E-03
367,600	3,757,500	Worker	0.270	1.56E-03
367,700	3,757,500	Worker	0.296	1.69E-03
367,800	3,757,500	Worker	0.314	1.73E-03
367,900	3,757,500	Worker	0.294	1.58E-03
368,000	3,757,500	Worker	0.257	1.36E-03

Table H.10-1 Total Project Cancer Risk and Chronic Harzard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
368,100	3,757,500	Worker	0.209	1.10E-03
368,200	3,757,500	Worker	0.164	8.77E-04
368,300	3,757,500	Worker	0.133	7.28E-04
368,400	3,757,500	Worker	0.115	6.37E-04
368,500	3,757,500	Worker	0.104	5.74E-04
368,600	3,757,500	Worker	0.095	5.22E-04
368,700	3,757,500	Worker	0.088	4.76E-04
368,800	3,757,500	Worker	0.081	4.35E-04
368,900	3,757,500	Worker	0.075	3.97E-04
369,000	3,757,500	Worker	0.069	3.62E-04
369,100	3,757,500	Worker	0.063	3.32E-04
369,200	3,757,500	Worker	0.057	3.05E-04
369,300	3,757,500	Worker	0.052	2.83E-04
369,400	3,757,500	Worker	0.048	2.64E-04
369,500	3,757,500	Worker	0.045	2.48E-04
369,600	3,757,500	Worker	0.043	2.34E-04
369,700	3,757,500	Worker	0.041	2.23E-04
369,800	3,757,500	Worker	0.040	2.14E-04
369,900	3,757,500	Worker	0.039	2.04E-04
370,000	3,757,500	Worker	0.037	1.95E-04
370,100	3,757,500	Worker	0.036	1.84E-04
370,200	3,757,500	Worker	0.034	1.73E-04
370,300	3,757,500	Worker	0.032	1.62E-04
370,400	3,757,500	Worker	0.030	1.50E-04
370,500	3,757,500	Worker	0.028	1.38E-04
370,600	3,757,500	Worker	0.026	1.26E-04
370,700	3,757,500	Worker	0.023	1.14E-04
370,800	3,757,500	Worker	0.021	1.03E-04
370,900	3,757,500	Worker	0.018	9.25E-05
371,000	3,757,500	Worker	0.016	8.30E-05
371,100	3,757,500	Worker	0.015	7.49E-05
371,200	3,757,500	Worker	0.013	6.80E-05
371,300	3,757,500	Worker	0.012	6.22E-05
366,600	3,757,600	Worker	0.051	3.04E-04
366,700	3,757,600	Worker	0.066	3.94E-04
366,800	3,757,600	Worker	0.088	5.29E-04
366,900	3,757,600	Worker	0.130	7.91E-04
367,000	3,757,600	Worker	0.215	1.32E-03
367,100	3,757,600	Worker	0.364	2.10E-03
367,200	3,757,600	Worker	0.457	2.47E-03
367,300	3,757,600	Worker	0.493	2.58E-03
367,400	3,757,600	Worker	0.498	2.68E-03
367,500	3,757,600	Worker	0.533	2.88E-03
367,600	3,757,600	Worker	0.547	2.94E-03
367,700	3,757,600	Worker	0.586	3.18E-03
367,900	3,757,600	Worker	0.949	5.09E-03
368,000	3,757,600	Worker	0.749	3.91E-03
368,100	3,757,600	Worker	0.563	2.87E-03
368,200	3,757,600	Worker	0.318	1.63E-03

Table H.10-1 Total Project Cancer Risk and Chronic Harzard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
368,300	3,757,600	Worker	0.211	1.13E-03
368,400	3,757,600	Worker	0.171	9.37E-04
368,500	3,757,600	Worker	0.150	8.25E-04
368,600	3,757,600	Worker	0.135	7.41E-04
368,700	3,757,600	Worker	0.124	6.69E-04
368,800	3,757,600	Worker	0.113	6.04E-04
368,900	3,757,600	Worker	0.103	5.44E-04
369,000	3,757,600	Worker	0.094	4.88E-04
369,100	3,757,600	Worker	0.084	4.36E-04
369,200	3,757,600	Worker	0.075	3.90E-04
369,300	3,757,600	Worker	0.066	3.51E-04
369,400	3,757,600	Worker	0.060	3.22E-04
369,500	3,757,600	Worker	0.055	3.00E-04
369,600	3,757,600	Worker	0.052	2.84E-04
369,700	3,757,600	Worker	0.050	2.73E-04
369,800	3,757,600	Worker	0.049	2.64E-04
369,900	3,757,600	Worker	0.048	2.55E-04
370,000	3,757,600	Worker	0.047	2.46E-04
370,100	3,757,600	Worker	0.046	2.34E-04
370,200	3,757,600	Worker	0.044	2.21E-04
370,300	3,757,600	Worker	0.042	2.07E-04
370,400	3,757,600	Worker	0.039	1.92E-04
370,500	3,757,600	Worker	0.036	1.76E-04
370,600	3,757,600	Worker	0.033	1.59E-04
370,700	3,757,600	Worker	0.029	1.41E-04
370,800	3,757,600	Worker	0.025	1.25E-04
370,900	3,757,600	Worker	0.022	1.09E-04
371,000	3,757,600	Worker	0.019	9.59E-05
371,100	3,757,600	Worker	0.017	8.50E-05
371,200	3,757,600	Worker	0.015	7.60E-05
371,300	3,757,600	Worker	0.013	6.89E-05
371,400	3,757,600	Worker	0.012	6.30E-05
366,500	3,757,700	Residential	0.030	2.19E-04
366,600	3,757,700	Worker	0.046	2.66E-04
366,700	3,757,700	Worker	0.058	3.36E-04
366,800	3,757,700	Worker	0.078	4.51E-04
366,900	3,757,700	Worker	0.118	6.73E-04
367,000	3,757,700	Worker	0.234	1.31E-03
368,800	3,757,700	Worker	0.170	8.97E-04
368,900	3,757,700	Worker	0.156	8.17E-04
369,000	3,757,700	Worker	0.142	7.28E-04
369,100	3,757,700	Worker	0.125	6.35E-04
369,200	3,757,700	Worker	0.107	5.42E-04
369,300	3,757,700	Worker	0.089	4.61E-04
369,400	3,757,700	Worker	0.076	4.04E-04
369,500	3,757,700	Worker	0.069	3.73E-04
369,600	3,757,700	Worker	0.065	3.56E-04
369,700	3,757,700	Worker	0.063	3.47E-04
369,800	3,757,700	Worker	0.062	3.37E-04

Table H.10-1 Total Project Cancer Risk and Chronic Harzard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
369,900	3,757,700	Worker	0.063	3.35E-04
370,000	3,757,700	Worker	0.061	3.21E-04
370,100	3,757,700	Worker	0.060	3.10E-04
370,200	3,757,700	Worker	0.059	2.96E-04
370,300	3,757,700	Worker	0.057	2.79E-04
370,400	3,757,700	Worker	0.054	2.60E-04
370,500	3,757,700	Worker	0.050	2.38E-04
370,600	3,757,700	Worker	0.045	2.12E-04
370,700	3,757,700	Worker	0.038	1.80E-04
370,800	3,757,700	Worker	0.033	1.57E-04
370,900	3,757,700	Worker	0.027	1.33E-04
371,000	3,757,700	Worker	0.023	1.13E-04
371,100	3,757,700	Worker	0.020	9.80E-05
371,200	3,757,700	Worker	0.017	8.62E-05
371,300	3,757,700	Worker	0.015	7.71E-05
371,400	3,757,700	Worker	0.013	6.99E-05
366,500	3,757,800	Residential	0.026	1.89E-04
366,600	3,757,800	Residential	0.031	2.21E-04
366,700	3,757,800	Residential	0.039	2.78E-04
366,800	3,757,800	Residential	0.051	3.64E-04
366,900	3,757,800	Worker	0.095	5.22E-04
369,700	3,757,800	Worker	0.081	4.47E-04
369,800	3,757,800	Worker	0.084	4.55E-04
369,900	3,757,800	Worker	0.084	4.54E-04
370,000	3,757,800	Worker	0.084	4.48E-04
370,100	3,757,800	Worker	0.085	4.40E-04
370,200	3,757,800	Worker	0.085	4.28E-04
370,300	3,757,800	Worker	0.085	4.12E-04
370,400	3,757,800	Worker	0.081	3.87E-04
370,500	3,757,800	Worker	0.076	3.55E-04
370,600	3,757,800	Worker	0.067	3.13E-04
370,700	3,757,800	Worker	0.056	2.61E-04
370,800	3,757,800	Worker	0.046	2.14E-04
370,900	3,757,800	Worker	0.036	1.71E-04
371,000	3,757,800	Worker	0.028	1.39E-04
371,100	3,757,800	Worker	0.023	1.16E-04
371,200	3,757,800	Worker	0.020	9.99E-05
371,300	3,757,800	Worker	0.017	8.80E-05
371,400	3,757,800	Worker	0.015	7.89E-05
366,500	3,757,900	Residential	0.022	1.60E-04
366,600	3,757,900	Residential	0.025	1.83E-04
366,700	3,757,900	Residential	0.032	2.28E-04
366,800	3,757,900	Residential	0.041	2.86E-04
366,900	3,757,900	Residential	0.056	3.86E-04
367,600	3,757,900	Sensitive	0.455	3.07E-03
367,600	3,757,900	Worker	0.605	3.07E-03
367,700	3,757,900	Sensitive	0.774	5.20E-03
367,700	3,757,900	Worker	1.033	5.20E-03
370,900	3,757,900	Worker	0.051	2.39E-04

Table H.10-1 Total Project Cancer Risk and Chronic Harzard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
371,000	3,757,900	Sensitive	0.027	1.79E-04
371,000	3,757,900	Worker	0.037	1.79E-04
371,100	3,757,900	Worker	0.029	1.43E-04
371,200	3,757,900	Worker	0.024	1.20E-04
371,300	3,757,900	Worker	0.020	1.03E-04
371,400	3,757,900	Worker	0.018	9.11E-05
366,500	3,758,000	Residential	0.018	1.32E-04
366,600	3,758,000	Residential	0.021	1.54E-04
366,700	3,758,000	Residential	0.027	1.93E-04
366,800	3,758,000	Residential	0.033	2.30E-04
366,900	3,758,000	Residential	0.042	2.91E-04
367,000	3,758,000	Residential	0.057	3.92E-04
367,100	3,758,000	Residential	0.084	5.67E-04
367,200	3,758,000	Residential	0.115	7.71E-04
367,300	3,758,000	Residential	0.148	9.86E-04
367,400	3,758,000	Residential	0.197	1.31E-03
367,500	3,758,000	Sensitive	0.253	1.68E-03
367,500	3,758,000	Worker	0.340	1.68E-03
367,600	3,758,000	Sensitive	0.291	1.96E-03
367,600	3,758,000	Worker	0.387	1.96E-03
367,700	3,758,000	Sensitive	0.470	3.16E-03
367,700	3,758,000	Worker	0.624	3.16E-03
368,200	3,758,000	Residential	1.064	6.84E-03
368,300	3,758,000	Residential	0.773	4.92E-03
368,400	3,758,000	Residential	0.616	3.96E-03
368,500	3,758,000	Residential	0.580	3.79E-03
368,600	3,758,000	Residential	0.532	3.49E-03
369,300	3,758,000	~~Worker~~ Residential	~~1.516~~ 1.087	6.81E-03
370,800	3,758,000	Worker	0.191	8.32E-04
370,900	3,758,000	Worker	0.089	4.03E-04
371,000	3,758,000	Worker	0.056	2.61E-04
371,100	3,758,000	Worker	0.040	1.93E-04
371,200	3,758,000	Residential	0.023	1.53E-04
371,300	3,758,000	Worker	0.026	1.27E-04
371,400	3,758,000	Worker	0.022	1.09E-04
366,600	3,758,100	Residential	0.019	1.35E-04
366,700	3,758,100	Residential	0.023	1.65E-04
366,800	3,758,100	Residential	0.027	1.91E-04
366,900	3,758,100	Residential	0.033	2.32E-04
367,000	3,758,100	Residential	0.041	2.82E-04
367,100	3,758,100	Residential	0.051	3.52E-04
367,200	3,758,100	Residential	0.065	4.43E-04
367,300	3,758,100	Residential	0.082	5.58E-04
367,400	3,758,100	Residential	0.109	7.38E-04
367,500	3,758,100	Residential	0.141	9.52E-04
367,600	3,758,100	Sensitive	0.193	1.31E-03
367,600	3,758,100	Worker	0.256	1.31E-03
367,700	3,758,100	Sensitive	0.354	2.41E-03

Table H.10-1 Total Project Cancer Risk and Chronic Harzard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
367,700	3,758,100	Worker	0.468	2.41E-03
368,000	3,758,100	Residential	0.776	4.95E-03
368,100	3,758,100	Residential	0.610	3.93E-03
368,200	3,758,100	Residential	0.499	3.23E-03
368,300	3,758,100	Residential	0.417	2.71E-03
368,400	3,758,100	Residential	0.359	2.34E-03
368,500	3,758,100	Residential	0.332	2.18E-03
368,600	3,758,100	Residential	0.318	2.09E-03
368,700	3,758,100	Residential	0.330	2.18E-03
368,800	3,758,100	Residential	0.450	2.95E-03
369,300	3,758,100	Worker	1.126	5.14E-03
370,800	3,758,100	Worker	1.043	4.39E-03
370,900	3,758,100	Worker	0.238	1.03E-03
371,000	3,758,100	Sensitive	0.076	4.78E-04
371,000	3,758,100	Worker	0.107	4.78E-04
371,100	3,758,100	Worker	0.064	2.97E-04
371,200	3,758,100	Residential	0.033	2.14E-04
371,300	3,758,100	Residential	0.025	1.66E-04
371,400	3,758,100	Residential	0.020	1.36E-04
366,600	3,758,200	Residential	0.018	1.26E-04
366,700	3,758,200	Residential	0.020	1.41E-04
366,800	3,758,200	Residential	0.023	1.63E-04
366,900	3,758,200	Residential	0.027	1.92E-04
367,000	3,758,200	Residential	0.032	2.22E-04
367,100	3,758,200	Residential	0.038	2.66E-04
367,200	3,758,200	Residential	0.047	3.24E-04
367,300	3,758,200	Residential	0.058	3.96E-04
367,400	3,758,200	Residential	0.072	4.93E-04
367,500	3,758,200	Residential	0.091	6.14E-04
367,600	3,758,200	Residential	0.120	8.05E-04
367,700	3,758,200	Residential	0.222	1.50E-03
367,800	3,758,200	Worker	0.778	3.79E-03
367,900	3,758,200	Sensitive	0.398	2.59E-03
367,900	3,758,200	Worker	0.543	2.59E-03
368,000	3,758,200	Sensitive	0.346	2.25E-03
368,000	3,758,200	Worker	0.472	2.25E-03
368,100	3,758,200	Residential	0.319	2.08E-03
368,200	3,758,200	Residential	0.305	1.99E-03
368,300	3,758,200	Residential	0.277	1.82E-03
368,400	3,758,200	Residential	0.249	1.64E-03
368,500	3,758,200	Residential	0.235	1.55E-03
368,600	3,758,200	Residential	0.226	1.49E-03
368,700	3,758,200	Residential	0.220	1.46E-03
368,800	3,758,200	Residential	0.228	1.51E-03
368,900	3,758,200	Residential	0.300	1.96E-03
369,000	3,758,200	Worker	0.567	2.71E-03
369,100	3,758,200	Worker	0.604	2.84E-03
369,200	3,758,200	Worker	0.772	3.60E-03
370,300	3,758,200	Sensitive	0.384	2.45E-03

Table H.10-1 Total Project Cancer Risk and Chronic Harzard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
370,300	3,758,200	Worker	0.530	2.45E-03
370,800	3,758,200	Worker	1.300	5.47E-03
370,900	3,758,200	Worker	0.401	1.71E-03
371,000	3,758,200	Worker	0.185	8.07E-04
371,100	3,758,200	Worker	0.103	4.63E-04
371,200	3,758,200	Residential	0.048	3.06E-04
371,300	3,758,200	Residential	0.034	2.22E-04
366,700	3,758,300	Residential	0.018	1.24E-04
366,800	3,758,300	Residential	0.020	1.42E-04
366,900	3,758,300	Residential	0.023	1.61E-04
367,000	3,758,300	Residential	0.026	1.84E-04
367,100	3,758,300	Residential	0.031	2.13E-04
367,200	3,758,300	Residential	0.036	2.51E-04
367,300	3,758,300	Residential	0.043	2.98E-04
367,400	3,758,300	Sensitive	0.052	3.58E-04
367,400	3,758,300	Worker	0.069	3.58E-04
367,500	3,758,300	Worker	0.083	4.29E-04
367,600	3,758,300	Residential	0.076	5.17E-04
367,700	3,758,300	Residential	0.092	6.29E-04
367,800	3,758,300	Sensitive	0.129	8.72E-04
367,800	3,758,300	Worker	0.171	8.72E-04
367,900	3,758,300	Sensitive	0.174	1.15E-03
367,900	3,758,300	Worker	0.233	1.15E-03
368,000	3,758,300	Sensitive	0.188	1.24E-03
368,000	3,758,300	Worker	0.252	1.24E-03
368,100	3,758,300	Sensitive	0.190	1.26E-03
368,100	3,758,300	Worker	0.256	1.26E-03
368,200	3,758,300	Residential	0.194	1.28E-03
368,300	3,758,300	Residential	0.192	1.27E-03
368,400	3,758,300	Residential	0.180	1.19E-03
368,500	3,758,300	Residential	0.172	1.14E-03
368,600	3,758,300	Sensitive	0.170	1.13E-03
368,600	3,758,300	Worker	0.228	1.13E-03
368,700	3,758,300	Sensitive	0.164	1.09E-03
368,700	3,758,300	Worker	0.220	1.09E-03
368,800	3,758,300	Residential	0.159	1.06E-03
368,900	3,758,300	Residential	0.174	1.16E-03
369,000	3,758,300	Worker	0.270	1.32E-03
369,100	3,758,300	Worker	0.304	1.47E-03
369,200	3,758,300	Worker	0.344	1.64E-03
369,300	3,758,300	Worker	0.459	2.15E-03
369,800	3,758,300	Residential	0.111	7.28E-04
369,900	3,758,300	Residential	0.103	6.81E-04
370,000	3,758,300	Residential	0.104	6.82E-04
370,100	3,758,300	Residential	0.109	7.11E-04
370,200	3,758,300	Residential	0.121	7.87E-04
370,300	3,758,300	Residential	0.154	9.91E-04
370,400	3,758,300	Residential	0.249	1.58E-03
370,500	3,758,300	Residential	0.542	3.41E-03

Table H.10-1 Total Project Cancer Risk and Chronic Harzard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
370,600	3,758,300	Residential	0.638	3.95E-03
370,700	3,758,300	Residential	0.457	2.81E-03
370,800	3,758,300	Residential	0.518	3.14E-03
370,900	3,758,300	Worker	0.403	1.73E-03
371,000	3,758,300	Worker	0.225	9.82E-04
371,100	3,758,300	Worker	0.136	6.05E-04
371,200	3,758,300	Sensitive	0.063	3.99E-04
371,200	3,758,300	Worker	0.088	3.99E-04
366,900	3,758,400	Residential	0.019	1.35E-04
367,000	3,758,400	Residential	0.022	1.56E-04
367,100	3,758,400	Residential	0.026	1.78E-04
367,200	3,758,400	Residential	0.029	2.05E-04
367,300	3,758,400	Residential	0.034	2.36E-04
367,400	3,758,400	Residential	0.039	2.73E-04
367,500	3,758,400	Worker	0.060	3.17E-04
367,600	3,758,400	Residential	0.053	3.68E-04
367,700	3,758,400	Residential	0.060	4.16E-04
367,800	3,758,400	Sensitive	0.072	5.00E-04
367,800	3,758,400	Worker	0.095	5.00E-04
367,900	3,758,400	Sensitive	0.090	6.15E-04
367,900	3,758,400	Worker	0.119	6.15E-04
368,000	3,758,400	Sensitive	0.107	7.21E-04
368,000	3,758,400	Worker	0.142	7.21E-04
368,100	3,758,400	Sensitive	0.120	8.03E-04
368,100	3,758,400	Worker	0.160	8.03E-04
368,200	3,758,400	Residential	0.128	8.55E-04
368,300	3,758,400	Residential	0.135	8.97E-04
368,400	3,758,400	Residential	0.134	8.89E-04
368,500	3,758,400	Residential	0.130	8.69E-04
368,600	3,758,400	Sensitive	0.130	8.67E-04
368,600	3,758,400	Worker	0.174	8.67E-04
368,700	3,758,400	Sensitive	0.127	8.47E-04
368,700	3,758,400	Worker	0.169	8.47E-04
368,800	3,758,400	Residential	0.125	8.39E-04
368,900	3,758,400	Worker	0.174	8.74E-04
369,000	3,758,400	Worker	0.181	9.06E-04
369,100	3,758,400	Worker	0.193	9.52E-04
369,200	3,758,400	Worker	0.206	1.01E-03
369,300	3,758,400	Worker	0.221	1.07E-03
369,800	3,758,400	Residential	0.104	6.88E-04
369,900	3,758,400	Residential	0.092	6.10E-04
370,000	3,758,400	Residential	0.086	5.67E-04
370,100	3,758,400	Residential	0.083	5.47E-04
370,200	3,758,400	Residential	0.088	5.76E-04
370,300	3,758,400	Residential	0.098	6.37E-04
370,400	3,758,400	Residential	0.117	7.54E-04
370,500	3,758,400	Residential	0.150	9.60E-04
370,600	3,758,400	Residential	0.196	1.23E-03
370,700	3,758,400	Residential	0.208	1.30E-03

Table H.10-1 Total Project Cancer Risk and Chronic Harzard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
370,800	3,758,400	Residential	0.201	1.25E-03
370,900	3,758,400	Worker	0.253	1.11E-03
371,000	3,758,400	Worker	0.194	8.59E-04
371,100	3,758,400	Worker	0.139	6.21E-04
371,200	3,758,400	Worker	0.100	4.51E-04
367,400	3,758,500	Residential	0.031	2.18E-04
367,500	3,758,500	Worker	0.045	2.44E-04
367,600	3,758,500	Worker	0.051	2.76E-04
367,700	3,758,500	Worker	0.055	3.00E-04
367,800	3,758,500	Worker	0.065	3.54E-04
367,900	3,758,500	Sensitive	0.057	4.00E-04
367,900	3,758,500	Worker	0.075	4.00E-04
368,000	3,758,500	Sensitive	0.069	4.76E-04
368,000	3,758,500	Worker	0.091	4.76E-04
368,100	3,758,500	Sensitive	0.080	5.45E-04
368,100	3,758,500	Worker	0.106	5.45E-04
368,200	3,758,500	Sensitive	0.089	5.99E-04
368,200	3,758,500	Worker	0.118	5.99E-04
368,600	3,758,500	Residential	0.098	6.58E-04
368,700	3,758,500	Residential	0.099	6.63E-04
368,800	3,758,500	Worker	0.133	6.75E-04
368,900	3,758,500	Worker	0.135	6.84E-04
369,000	3,758,500	Worker	0.137	6.92E-04
369,100	3,758,500	Worker	0.141	7.09E-04
369,200	3,758,500	Worker	0.142	7.13E-04
369,300	3,758,500	Worker	0.149	7.38E-04
369,800	3,758,500	Residential	0.094	6.20E-04
369,900	3,758,500	Residential	0.085	5.60E-04
370,000	3,758,500	Residential	0.078	5.17E-04
370,100	3,758,500	Residential	0.074	4.89E-04
370,200	3,758,500	Residential	0.073	4.80E-04
370,300	3,758,500	Residential	0.074	4.88E-04
370,400	3,758,500	Residential	0.078	5.11E-04
370,500	3,758,500	Residential	0.086	5.60E-04
370,600	3,758,500	Residential	0.099	6.39E-04
370,700	3,758,500	Residential	0.111	7.06E-04
370,800	3,758,500	Residential	0.116	7.33E-04
370,900	3,758,500	Worker	0.156	7.06E-04
371,000	3,758,500	Worker	0.140	6.35E-04
371,100	3,758,500	Worker	0.118	5.38E-04
371,200	3,758,500	Worker	0.095	4.36E-04
367,500	3,758,600	Residential	0.027	1.89E-04
367,600	3,758,600	Residential	0.029	2.08E-04
367,700	3,758,600	Sensitive	0.032	2.29E-04
367,700	3,758,600	Worker	0.041	2.29E-04
367,800	3,758,600	Worker	0.043	2.42E-04
367,900	3,758,600	Worker	0.050	2.76E-04
368,000	3,758,600	Sensitive	0.050	3.46E-04
368,000	3,758,600	Worker	0.065	3.46E-04

Table H.10-1 Total Project Cancer Risk and Chronic Harzard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
368,100	3,758,600	Sensitive	0.057	3.91E-04
368,100	3,758,600	Worker	0.074	3.91E-04
368,800	3,758,600	Worker	0.106	5.42E-04
368,900	3,758,600	Worker	0.108	5.51E-04
369,000	3,758,600	Worker	0.109	5.56E-04
369,100	3,758,600	Worker	0.110	5.63E-04
369,200	3,758,600	Worker	0.110	5.59E-04
369,300	3,758,600	Worker	0.113	5.68E-04
369,400	3,758,600	Residential	0.087	5.81E-04
369,500	3,758,600	Residential	0.087	5.80E-04
369,600	3,758,600	Residential	0.088	5.82E-04
369,700	3,758,600	Residential	0.085	5.63E-04
369,800	3,758,600	Residential	0.080	5.31E-04
369,900	3,758,600	Residential	0.074	4.93E-04
370,000	3,758,600	Residential	0.069	4.63E-04
370,100	3,758,600	Residential	0.066	4.42E-04
370,200	3,758,600	Residential	0.064	4.24E-04
370,300	3,758,600	Residential	0.062	4.12E-04
370,400	3,758,600	Residential	0.062	4.11E-04
370,500	3,758,600	Residential	0.064	4.21E-04
370,600	3,758,600	Residential	0.068	4.42E-04
370,700	3,758,600	Residential	0.071	4.62E-04
370,800	3,758,600	Residential	0.075	4.80E-04
370,900	3,758,600	Residential	0.076	4.83E-04
371,000	3,758,600	Worker	0.101	4.66E-04
371,100	3,758,600	Residential	0.068	4.31E-04
367,600	3,758,700	Residential	0.023	1.67E-04
367,700	3,758,700	Residential	0.025	1.80E-04
367,800	3,758,700	Residential	0.027	1.92E-04
369,000	3,758,700	Residential	0.067	4.54E-04
369,100	3,758,700	Residential	0.068	4.59E-04
369,200	3,758,700	Residential	0.066	4.47E-04
369,300	3,758,700	Residential	0.068	4.61E-04
369,400	3,758,700	Residential	0.069	4.68E-04
369,500	3,758,700	Residential	0.071	4.73E-04
369,600	3,758,700	Residential	0.071	4.72E-04
369,700	3,758,700	Residential	0.070	4.67E-04
369,800	3,758,700	Residential	0.068	4.52E-04
369,900	3,758,700	Residential	0.064	4.29E-04
370,000	3,758,700	Residential	0.061	4.09E-04
370,100	3,758,700	Residential	0.059	3.94E-04
370,200	3,758,700	Sensitive	0.057	3.82E-04
370,200	3,758,700	Worker	0.076	3.82E-04
370,300	3,758,700	Residential	0.055	3.66E-04
370,400	3,758,700	Residential	0.053	3.56E-04
370,500	3,758,700	Residential	0.052	3.46E-04
370,600	3,758,700	Residential	0.052	3.42E-04
370,700	3,758,700	Residential	0.053	3.49E-04
370,800	3,758,700	Residential	0.055	3.57E-04

Table H.10-1 Total Project Cancer Risk and Chronic Harzard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
370,900	3,758,700	Residential	0.055	3.59E-04
371,000	3,758,700	Worker	0.075	3.56E-04
369,000	3,758,800	Residential	0.055	3.75E-04
369,100	3,758,800	Residential	0.055	3.75E-04
369,200	3,758,800	Residential	0.054	3.69E-04
369,300	3,758,800	Residential	0.055	3.76E-04
369,400	3,758,800	Residential	0.058	3.90E-04
369,500	3,758,800	Residential	0.059	3.95E-04
369,600	3,758,800	Residential	0.059	3.96E-04
369,700	3,758,800	Residential	0.059	3.94E-04
369,800	3,758,800	Residential	0.057	3.83E-04
369,900	3,758,800	Residential	0.055	3.72E-04
370,000	3,758,800	Residential	0.054	3.63E-04
370,100	3,758,800	Residential	0.052	3.53E-04
370,200	3,758,800	Sensitive	0.051	3.43E-04
370,200	3,758,800	Worker	0.068	3.43E-04
369,100	3,758,900	Residential	0.046	3.13E-04
369,200	3,758,900	Residential	0.045	3.10E-04
369,300	3,758,900	Residential	0.047	3.21E-04
369,400	3,758,900	Residential	0.049	3.31E-04
369,500	3,758,900	Residential	0.050	3.36E-04
369,600	3,758,900	Residential	0.050	3.38E-04
369,700	3,758,900	Residential	0.050	3.38E-04
369,800	3,758,900	Residential	0.049	3.28E-04
369,900	3,758,900	Residential	0.048	3.25E-04
370,000	3,758,900	Residential	0.048	3.22E-04
370,100	3,758,900	Residential	0.047	3.16E-04
369,200	3,759,000	Residential	0.038	2.64E-04
369,300	3,759,000	Residential	0.040	2.75E-04
369,400	3,759,000	Residential	0.042	2.83E-04
369,500	3,759,000	Residential	0.043	2.89E-04
369,600	3,759,000	Residential	0.043	2.92E-04
369,700	3,759,000	Residential	0.043	2.91E-04
369,800	3,759,000	Residential	0.042	2.87E-04
369,900	3,759,000	Residential	0.042	2.86E-04
370,000	3,759,000	Residential	0.042	2.86E-04
371,014	3,757,908	Sensitive	0.027	1.77E-04
371,014	3,757,908	Worker	0.037	1.77E-04
370,977	3,758,096	Sensitive	0.086	5.36E-04
370,977	3,758,096	Worker	0.121	5.36E-04
371,426	3,758,504	Sensitive	0.041	2.66E-04
371,426	3,758,504	Worker	0.057	2.66E-04
370,982	3,758,117	Sensitive	0.096	5.95E-04
370,982	3,758,117	Worker	0.135	5.95E-04
370,977	3,758,085	Sensitive	0.079	4.95E-04
370,977	3,758,085	Worker	0.111	4.95E-04
367,771	3,758,595	Sensitive	0.034	2.40E-04
367,771	3,758,595	Worker	0.043	2.40E-04
371,007	3,758,088	Sensitive	0.068	4.24E-04

Table H.10-1 Total Project Cancer Risk and Chronic Harzard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Cancer Risk	Chronic Hazard Index
371,007	3,758,088	Worker	0.094	4.24E-04
367,714	3,758,610	Sensitive	0.032	2.26E-04
367,714	3,758,610	Worker	0.040	2.26E-04
370,224	3,758,180	Sensitive	0.250	1.61E-03
370,224	3,758,180	Worker	0.342	1.61E-03
370,157	3,758,889	Sensitive	0.047	3.14E-04
370,157	3,758,889	Worker	0.062	3.14E-04
368,686	3,758,355	Sensitive	0.143	9.54E-04
368,686	3,758,355	Worker	0.191	9.54E-04
367,401	3,758,280	Sensitive	0.055	3.80E-04
367,401	3,758,280	Worker	0.073	3.80E-04
367,526	3,758,001	Sensitive	0.255	1.70E-03
367,526	3,758,001	Worker	0.341	1.70E-03
370,227	3,758,395	Sensitive	0.092	5.98E-04
370,227	3,758,395	Worker	0.124	5.98E-04
367,944	3,758,519	Sensitive	0.058	4.04E-04
367,944	3,758,519	Worker	0.076	4.04E-04
368,310	3,758,513	Sensitive	0.092	6.19E-04
368,310	3,758,513	Worker	0.123	6.19E-04
369,745	3,758,680	Sensitive	0.072	4.77E-04
369,745	3,758,680	Worker	0.096	4.77E-04
370,009	3,758,321	Sensitive	0.098	6.44E-04
370,009	3,758,321	Worker	0.133	6.44E-04
370,058	3,758,870	Sensitive	0.049	3.30E-04
370,058	3,758,870	Worker	0.065	3.30E-04

Table H.10-2 Total Project Acute Hazard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
369,783	3,757,810	Fenceline	5.06E-04
369,684	3,757,799	Fenceline	5.00E-04
366,650	3,756,750	Worker	1.77E-04
366,900	3,756,750	Worker	2.05E-04
367,150	3,756,750	Worker	2.77E-04
367,400	3,756,750	Worker	2.17E-04
367,650	3,756,750	Worker	2.23E-04
367,900	3,756,750	Worker	2.35E-04
368,150	3,756,750	Worker	2.16E-04
368,400	3,756,750	Worker	2.28E-04
368,650	3,756,750	Worker	2.48E-04
368,900	3,756,750	Worker	2.54E-04
369,150	3,756,750	Worker	2.35E-04
366,400	3,757,000	OpenWater	1.90E-04
366,650	3,757,000	Worker	2.05E-04
366,900	3,757,000	Worker	2.45E-04
367,150	3,757,000	Worker	2.58E-04
367,400	3,757,000	Worker	2.80E-04
367,650	3,757,000	Worker	2.93E-04
367,900	3,757,000	Worker	2.90E-04
368,150	3,757,000	Worker	2.67E-04
368,400	3,757,000	Worker	2.82E-04
368,650	3,757,000	Worker	2.97E-04
368,900	3,757,000	Worker	2.74E-04
369,150	3,757,000	Worker	2.86E-04
369,400	3,757,000	Worker	2.79E-04
369,650	3,757,000	Worker	2.99E-04
369,900	3,757,000	Worker	2.95E-04
370,150	3,757,000	Worker	2.80E-04
370,400	3,757,000	Worker	2.66E-04
370,650	3,757,000	Worker	2.22E-04
370,900	3,757,000	Worker	1.91E-04
371,150	3,757,000	Worker	1.77E-04
371,400	3,757,000	Worker	1.73E-04
366,400	3,757,250	Worker	2.34E-04
366,650	3,757,250	Worker	2.73E-04
368,900	3,757,250	Worker	3.93E-04
369,150	3,757,250	Worker	3.93E-04
369,400	3,757,250	Worker	3.62E-04
369,650	3,757,250	Worker	3.58E-04
369,900	3,757,250	Worker	3.51E-04
370,150	3,757,250	Worker	3.25E-04
370,400	3,757,250	Worker	3.02E-04
370,650	3,757,250	Worker	2.56E-04
370,900	3,757,250	Worker	2.13E-04
371,150	3,757,250	Worker	2.06E-04
371,400	3,757,250	Worker	1.96E-04
371,650	3,757,250	Worker	1.55E-04
366,150	3,757,500	OpenWater	2.79E-04

Table H.10-2 Total Project Acute Hazard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
366,400	3,757,500	Worker	3.25E-04
371,400	3,757,500	Worker	1.90E-04
371,650	3,757,500	Worker	1.45E-04
371,900	3,757,500	Worker	1.35E-04
366,150	3,757,750	Worker	2.89E-04
366,400	3,757,750	Residential	3.78E-04
371,650	3,757,750	Worker	1.97E-04
371,900	3,757,750	Worker	1.72E-04
366,150	3,758,000	Residential	2.57E-04
366,400	3,758,000	Residential	4.03E-04
371,650	3,758,000	Worker	1.83E-04
371,900	3,758,000	Worker	1.43E-04
366,150	3,758,250	Residential	1.94E-04
366,400	3,758,250	Residential	4.26E-04
371,400	3,758,250	Residential	2.01E-04
371,650	3,758,250	Residential	1.56E-04
366,400	3,758,500	Residential	2.72E-04
366,650	3,758,500	Residential	2.09E-04
366,900	3,758,500	Residential	2.71E-04
367,150	3,758,500	Residential	2.74E-04
368,400	3,758,500	Residential	3.93E-04
371,400	3,758,500	Sensitive	3.87E-04
371,650	3,758,500	Residential	1.85E-04
366,650	3,758,750	Residential	2.81E-04
366,900	3,758,750	Residential	1.96E-04
367,150	3,758,750	Residential	2.09E-04
367,400	3,758,750	Residential	3.17E-04
367,650	3,758,750	Residential	2.52E-04
367,900	3,758,750	Residential	3.15E-04
368,150	3,758,750	Residential	3.01E-04
368,400	3,758,750	Residential	3.27E-04
368,650	3,758,750	Residential	3.43E-04
368,900	3,758,750	Worker	3.23E-04
370,400	3,758,750	Residential	3.28E-04
370,650	3,758,750	Residential	2.85E-04
370,900	3,758,750	Residential	3.29E-04
371,150	3,758,750	Residential	4.29E-04
371,400	3,758,750	Residential	3.50E-04
371,650	3,758,750	Residential	2.40E-04
367,150	3,759,000	Residential	2.25E-04
367,400	3,759,000	Residential	2.22E-04
367,650	3,759,000	Residential	2.38E-04
367,900	3,759,000	Residential	1.97E-04
368,150	3,759,000	Residential	2.33E-04
368,400	3,759,000	Residential	2.68E-04
368,650	3,759,000	Residential	2.68E-04
368,900	3,759,000	Residential	3.02E-04
370,150	3,759,000	Residential	3.06E-04
370,400	3,759,000	Residential	2.52E-04

Table H.10-2 Total Project Acute Hazard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
370,650	3,759,000	Residential	2.49E-04
370,900	3,759,000	Residential	2.86E-04
371,150	3,759,000	Residential	3.15E-04
371,400	3,759,000	Residential	3.09E-04
368,650	3,759,250	Residential	2.48E-04
368,900	3,759,250	Residential	2.92E-04
369,150	3,759,250	Residential	3.03E-04
369,400	3,759,250	Residential	2.94E-04
369,650	3,759,250	Residential	3.35E-04
369,900	3,759,250	Residential	2.77E-04
370,150	3,759,250	Residential	2.06E-04
370,400	3,759,250	Residential	1.98E-04
370,650	3,759,250	Residential	2.41E-04
370,900	3,759,250	Residential	2.41E-04
369,150	3,759,500	Residential	2.69E-04
369,400	3,759,500	Residential	2.32E-04
369,650	3,759,500	Residential	2.47E-04
369,900	3,759,500	Residential	2.35E-04
370,150	3,759,500	Residential	1.91E-04
368,679	3,758,367	Sensitive	5.24E-04
368,542	3,758,598	Sensitive	5.14E-04
370,162	3,758,703	Sensitive	3.42E-04
367,587	3,758,653	Sensitive	3.08E-04
368,280	3,758,501	Sensitive	3.41E-04
369,256	3,758,155	Sensitive	7.73E-04
370,191	3,758,848	Sensitive	3.45E-04
371,161	3,758,238	Sensitive	2.82E-04
367,700	3,757,100	Worker	3.16E-04
367,800	3,757,100	Worker	3.23E-04
366,900	3,757,200	Worker	3.70E-04
367,000	3,757,200	Worker	4.12E-04
367,100	3,757,200	Worker	3.04E-04
367,200	3,757,200	Worker	3.07E-04
367,300	3,757,200	Worker	3.33E-04
367,400	3,757,200	Worker	4.32E-04
367,500	3,757,200	Worker	4.05E-04
367,600	3,757,200	Worker	3.43E-04
367,700	3,757,200	Worker	3.61E-04
367,800	3,757,200	Worker	3.65E-04
367,900	3,757,200	Worker	3.62E-04
368,000	3,757,200	Worker	3.60E-04
368,100	3,757,200	Worker	3.45E-04
368,200	3,757,200	Worker	3.42E-04
368,300	3,757,200	Worker	3.44E-04
368,400	3,757,200	Worker	3.56E-04
368,500	3,757,200	Worker	3.56E-04
368,600	3,757,200	Worker	3.44E-04
368,700	3,757,200	Worker	3.38E-04
368,800	3,757,200	Worker	3.47E-04

Table H.10-2 Total Project Acute Hazard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
366,800	3,757,300	Worker	4.02E-04
366,900	3,757,300	Worker	4.49E-04
367,000	3,757,300	Worker	3.39E-04
367,100	3,757,300	Worker	3.38E-04
367,200	3,757,300	Worker	3.55E-04
367,300	3,757,300	Worker	3.81E-04
367,400	3,757,300	Worker	5.05E-04
367,500	3,757,300	Worker	4.34E-04
367,600	3,757,300	Worker	3.91E-04
367,700	3,757,300	Worker	4.00E-04
367,800	3,757,300	Worker	4.21E-04
367,900	3,757,300	Worker	4.18E-04
368,000	3,757,300	Worker	4.13E-04
368,100	3,757,300	Worker	3.99E-04
368,200	3,757,300	Worker	3.94E-04
368,300	3,757,300	Worker	4.08E-04
368,400	3,757,300	Worker	4.06E-04
368,500	3,757,300	Worker	3.90E-04
368,600	3,757,300	Worker	3.93E-04
368,700	3,757,300	Worker	4.08E-04
368,800	3,757,300	Worker	4.23E-04
368,900	3,757,300	Worker	4.26E-04
369,000	3,757,300	Worker	4.24E-04
369,100	3,757,300	Worker	4.13E-04
369,200	3,757,300	Worker	4.06E-04
369,300	3,757,300	Worker	3.82E-04
369,400	3,757,300	Worker	3.65E-04
369,500	3,757,300	Worker	3.70E-04
369,600	3,757,300	Worker	3.68E-04
369,700	3,757,300	Worker	3.69E-04
370,900	3,757,300	Worker	2.21E-04
371,000	3,757,300	Worker	2.19E-04
366,700	3,757,400	Worker	4.11E-04
366,800	3,757,400	Worker	4.99E-04
366,900	3,757,400	Worker	4.20E-04
367,000	3,757,400	Worker	3.87E-04
367,100	3,757,400	Worker	3.90E-04
367,200	3,757,400	Worker	4.20E-04
367,300	3,757,400	Worker	4.54E-04
367,400	3,757,400	Worker	5.76E-04
367,500	3,757,400	Worker	4.81E-04
367,600	3,757,400	Worker	4.79E-04
367,700	3,757,400	Worker	5.14E-04
367,800	3,757,400	Worker	5.15E-04
367,900	3,757,400	Worker	5.04E-04
368,000	3,757,400	Worker	4.87E-04
368,100	3,757,400	Worker	4.72E-04
368,200	3,757,400	Worker	4.73E-04
368,300	3,757,400	Worker	4.75E-04

Table H.10-2 Total Project Acute Hazard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
368,400	3,757,400	Worker	4.72E-04
368,500	3,757,400	Worker	4.86E-04
368,600	3,757,400	Worker	4.95E-04
368,700	3,757,400	Worker	4.96E-04
368,800	3,757,400	Worker	4.84E-04
368,900	3,757,400	Worker	4.69E-04
369,000	3,757,400	Worker	4.59E-04
369,100	3,757,400	Worker	4.43E-04
369,200	3,757,400	Worker	4.22E-04
369,300	3,757,400	Worker	3.89E-04
369,400	3,757,400	Worker	3.81E-04
369,500	3,757,400	Worker	3.84E-04
369,600	3,757,400	Worker	3.90E-04
369,700	3,757,400	Worker	3.90E-04
369,800	3,757,400	Worker	3.77E-04
369,900	3,757,400	Worker	3.66E-04
370,000	3,757,400	Worker	3.63E-04
370,100	3,757,400	Worker	3.50E-04
370,200	3,757,400	Worker	3.39E-04
370,300	3,757,400	Worker	3.45E-04
370,400	3,757,400	Worker	3.40E-04
370,500	3,757,400	Worker	3.29E-04
370,600	3,757,400	Worker	2.97E-04
370,700	3,757,400	Worker	2.90E-04
370,800	3,757,400	Worker	2.70E-04
370,900	3,757,400	Worker	2.43E-04
371,000	3,757,400	Worker	2.43E-04
371,100	3,757,400	Worker	2.35E-04
371,200	3,757,400	Worker	2.32E-04
366,600	3,757,500	Worker	4.02E-04
366,700	3,757,500	Worker	5.54E-04
366,800	3,757,500	Worker	5.15E-04
366,900	3,757,500	Worker	4.92E-04
367,000	3,757,500	Worker	4.77E-04
367,100	3,757,500	Worker	4.82E-04
367,200	3,757,500	Worker	5.10E-04
367,300	3,757,500	Worker	5.99E-04
367,400	3,757,500	Worker	6.57E-04
367,500	3,757,500	Worker	6.11E-04
367,600	3,757,500	Worker	6.34E-04
367,700	3,757,500	Worker	6.95E-04
367,800	3,757,500	Worker	6.87E-04
367,900	3,757,500	Worker	6.68E-04
368,000	3,757,500	Worker	6.39E-04
368,100	3,757,500	Worker	6.09E-04
368,200	3,757,500	Worker	6.31E-04
368,300	3,757,500	Worker	6.45E-04
368,400	3,757,500	Worker	6.33E-04
368,500	3,757,500	Worker	6.11E-04

Table H.10-2 Total Project Acute Hazard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
368,600	3,757,500	Worker	5.84E-04
368,700	3,757,500	Worker	5.41E-04
368,800	3,757,500	Worker	5.16E-04
368,900	3,757,500	Worker	5.02E-04
369,000	3,757,500	Worker	4.71E-04
369,100	3,757,500	Worker	4.61E-04
369,200	3,757,500	Worker	4.47E-04
369,300	3,757,500	Worker	4.08E-04
369,400	3,757,500	Worker	4.06E-04
369,500	3,757,500	Worker	4.15E-04
369,600	3,757,500	Worker	4.13E-04
369,700	3,757,500	Worker	4.03E-04
369,800	3,757,500	Worker	3.93E-04
369,900	3,757,500	Worker	3.80E-04
370,000	3,757,500	Worker	3.75E-04
370,100	3,757,500	Worker	3.89E-04
370,200	3,757,500	Worker	3.89E-04
370,300	3,757,500	Worker	3.91E-04
370,400	3,757,500	Worker	3.90E-04
370,500	3,757,500	Worker	3.73E-04
370,600	3,757,500	Worker	3.40E-04
370,700	3,757,500	Worker	3.37E-04
370,800	3,757,500	Worker	3.04E-04
370,900	3,757,500	Worker	2.76E-04
371,000	3,757,500	Worker	2.65E-04
371,100	3,757,500	Worker	2.58E-04
371,200	3,757,500	Worker	2.46E-04
371,300	3,757,500	Worker	2.14E-04
366,600	3,757,600	Worker	4.56E-04
366,700	3,757,600	Worker	5.76E-04
366,800	3,757,600	Worker	5.88E-04
366,900	3,757,600	Worker	6.50E-04
367,000	3,757,600	Worker	6.95E-04
367,100	3,757,600	Worker	7.46E-04
367,200	3,757,600	Worker	8.29E-04
367,300	3,757,600	Worker	9.94E-04
367,400	3,757,600	Worker	8.61E-04
367,500	3,757,600	Worker	8.49E-04
367,600	3,757,600	Worker	8.89E-04
367,700	3,757,600	Worker	1.03E-03
367,900	3,757,600	Worker	1.20E-03
368,000	3,757,600	Worker	1.08E-03
368,100	3,757,600	Worker	1.02E-03
368,200	3,757,600	Worker	9.79E-04
368,300	3,757,600	Worker	8.73E-04
368,400	3,757,600	Worker	7.47E-04
368,500	3,757,600	Worker	6.50E-04
368,600	3,757,600	Worker	5.87E-04
368,700	3,757,600	Worker	5.62E-04

Table H.10-2 Total Project Acute Hazard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
368,800	3,757,600	Worker	5.33E-04
368,900	3,757,600	Worker	5.31E-04
369,000	3,757,600	Worker	5.24E-04
369,100	3,757,600	Worker	5.14E-04
369,200	3,757,600	Worker	4.98E-04
369,300	3,757,600	Worker	4.55E-04
369,400	3,757,600	Worker	4.67E-04
369,500	3,757,600	Worker	4.66E-04
369,600	3,757,600	Worker	4.46E-04
369,700	3,757,600	Worker	4.38E-04
369,800	3,757,600	Worker	4.26E-04
369,900	3,757,600	Worker	4.32E-04
370,000	3,757,600	Worker	4.35E-04
370,100	3,757,600	Worker	4.49E-04
370,200	3,757,600	Worker	4.53E-04
370,300	3,757,600	Worker	4.50E-04
370,400	3,757,600	Worker	4.56E-04
370,500	3,757,600	Worker	4.36E-04
370,600	3,757,600	Worker	3.83E-04
370,700	3,757,600	Worker	3.92E-04
370,800	3,757,600	Worker	3.51E-04
370,900	3,757,600	Worker	3.08E-04
371,000	3,757,600	Worker	2.98E-04
371,100	3,757,600	Worker	2.94E-04
371,200	3,757,600	Worker	2.52E-04
371,300	3,757,600	Worker	2.23E-04
371,400	3,757,600	Worker	1.96E-04
366,500	3,757,700	Residential	4.46E-04
366,600	3,757,700	Worker	6.66E-04
366,700	3,757,700	Worker	5.91E-04
366,800	3,757,700	Worker	6.76E-04
366,900	3,757,700	Worker	8.01E-04
367,000	3,757,700	Worker	1.00E-03
368,800	3,757,700	Worker	5.58E-04
368,900	3,757,700	Worker	5.70E-04
369,000	3,757,700	Worker	5.87E-04
369,100	3,757,700	Worker	5.81E-04
369,200	3,757,700	Worker	5.57E-04
369,300	3,757,700	Worker	5.20E-04
369,400	3,757,700	Worker	5.31E-04
369,500	3,757,700	Worker	5.32E-04
369,600	3,757,700	Worker	5.04E-04
369,700	3,757,700	Worker	4.82E-04
369,800	3,757,700	Worker	4.71E-04
369,900	3,757,700	Worker	5.05E-04
370,000	3,757,700	Worker	4.82E-04
370,100	3,757,700	Worker	4.89E-04
370,200	3,757,700	Worker	4.97E-04
370,300	3,757,700	Worker	4.97E-04

Table H.10-2 Total Project Acute Hazard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
370,400	3,757,700	Worker	5.02E-04
370,500	3,757,700	Worker	4.82E-04
370,600	3,757,700	Worker	4.36E-04
370,700	3,757,700	Worker	4.30E-04
370,800	3,757,700	Worker	3.81E-04
370,900	3,757,700	Worker	3.40E-04
371,000	3,757,700	Worker	3.35E-04
371,100	3,757,700	Worker	2.88E-04
371,200	3,757,700	Worker	2.48E-04
371,300	3,757,700	Worker	2.19E-04
371,400	3,757,700	Worker	1.96E-04
366,500	3,757,800	Residential	4.76E-04
366,600	3,757,800	Residential	7.09E-04
366,700	3,757,800	Residential	5.51E-04
366,800	3,757,800	Residential	6.00E-04
366,900	3,757,800	Worker	6.55E-04
369,700	3,757,800	Worker	5.02E-04
369,800	3,757,800	Worker	5.07E-04
369,900	3,757,800	Worker	5.06E-04
370,000	3,757,800	Worker	5.28E-04
370,100	3,757,800	Worker	5.46E-04
370,200	3,757,800	Worker	5.64E-04
370,300	3,757,800	Worker	5.73E-04
370,400	3,757,800	Worker	5.87E-04
370,500	3,757,800	Worker	5.69E-04
370,600	3,757,800	Worker	5.28E-04
370,700	3,757,800	Worker	5.27E-04
370,800	3,757,800	Worker	4.25E-04
370,900	3,757,800	Worker	4.02E-04
371,000	3,757,800	Worker	3.50E-04
371,100	3,757,800	Worker	3.06E-04
371,200	3,757,800	Worker	2.64E-04
371,300	3,757,800	Worker	2.42E-04
371,400	3,757,800	Worker	2.39E-04
366,500	3,757,900	Residential	5.35E-04
366,600	3,757,900	Residential	6.41E-04
366,700	3,757,900	Residential	4.84E-04
366,800	3,757,900	Residential	4.69E-04
366,900	3,757,900	Residential	5.24E-04
367,600	3,757,900	Sensitive	8.89E-04
367,700	3,757,900	Sensitive	1.13E-03
370,900	3,757,900	Worker	5.09E-04
371,000	3,757,900	Sensitive	4.20E-04
371,100	3,757,900	Worker	3.46E-04
371,200	3,757,900	Worker	3.30E-04
371,300	3,757,900	Worker	3.04E-04
371,400	3,757,900	Worker	2.77E-04
366,500	3,758,000	Residential	5.55E-04
366,600	3,758,000	Residential	5.28E-04

Table H.10-2 Total Project Acute Hazard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
366,700	3,758,000	Residential	3.73E-04
366,800	3,758,000	Residential	3.66E-04
366,900	3,758,000	Residential	4.01E-04
367,000	3,758,000	Residential	4.65E-04
367,100	3,758,000	Residential	5.34E-04
367,200	3,758,000	Residential	6.05E-04
367,300	3,758,000	Residential	6.16E-04
367,400	3,758,000	Residential	6.56E-04
367,500	3,758,000	Sensitive	6.83E-04
367,600	3,758,000	Sensitive	7.64E-04
367,700	3,758,000	Sensitive	9.70E-04
368,200	3,758,000	Residential	1.01E-03
368,300	3,758,000	Residential	1.00E-03
368,400	3,758,000	Residential	8.91E-04
368,500	3,758,000	Residential	7.22E-04
368,600	3,758,000	Residential	7.40E-04
369,300	3,758,000	~~Worker~~ Residential	9.85E-04
370,800	3,758,000	Worker	9.02E-04
370,900	3,758,000	Worker	5.94E-04
371,000	3,758,000	Worker	4.98E-04
371,100	3,758,000	Worker	4.17E-04
371,200	3,758,000	Residential	3.51E-04
371,300	3,758,000	Worker	2.98E-04
371,400	3,758,000	Worker	2.55E-04
366,600	3,758,100	Residential	4.38E-04
366,700	3,758,100	Residential	3.24E-04
366,800	3,758,100	Residential	3.38E-04
366,900	3,758,100	Residential	3.65E-04
367,000	3,758,100	Residential	4.15E-04
367,100	3,758,100	Residential	4.41E-04
367,200	3,758,100	Residential	5.09E-04
367,300	3,758,100	Residential	5.61E-04
367,400	3,758,100	Residential	5.00E-04
367,500	3,758,100	Residential	5.57E-04
367,600	3,758,100	Sensitive	6.42E-04
367,700	3,758,100	Sensitive	8.18E-04
368,000	3,758,100	Residential	9.35E-04
368,100	3,758,100	Residential	7.69E-04
368,200	3,758,100	Residential	6.37E-04
368,300	3,758,100	Residential	6.80E-04
368,400	3,758,100	Residential	7.17E-04
368,500	3,758,100	Residential	6.34E-04
368,600	3,758,100	Residential	5.75E-04
368,700	3,758,100	Residential	7.23E-04
368,800	3,758,100	Residential	8.63E-04
369,300	3,758,100	Worker	7.49E-04
370,800	3,758,100	Worker	1.07E-03
370,900	3,758,100	Worker	6.83E-04

Table H.10-2 Total Project Acute Hazard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
371,000	3,758,100	Sensitive	4.93E-04
371,100	3,758,100	Worker	3.78E-04
371,200	3,758,100	Residential	3.01E-04
371,300	3,758,100	Residential	2.49E-04
371,400	3,758,100	Residential	2.12E-04
366,600	3,758,200	Residential	2.80E-04
366,700	3,758,200	Residential	2.81E-04
366,800	3,758,200	Residential	2.97E-04
366,900	3,758,200	Residential	3.17E-04
367,000	3,758,200	Residential	3.53E-04
367,100	3,758,200	Residential	3.63E-04
367,200	3,758,200	Residential	3.81E-04
367,300	3,758,200	Residential	4.00E-04
367,400	3,758,200	Residential	4.27E-04
367,500	3,758,200	Residential	4.72E-04
367,600	3,758,200	Residential	5.81E-04
367,700	3,758,200	Residential	7.59E-04
367,800	3,758,200	Worker	7.69E-04
367,900	3,758,200	Sensitive	5.66E-04
368,000	3,758,200	Sensitive	5.94E-04
368,100	3,758,200	Residential	6.15E-04
368,200	3,758,200	Residential	5.05E-04
368,300	3,758,200	Residential	5.16E-04
368,400	3,758,200	Residential	5.80E-04
368,500	3,758,200	Residential	5.74E-04
368,600	3,758,200	Residential	4.95E-04
368,700	3,758,200	Residential	6.07E-04
368,800	3,758,200	Residential	7.12E-04
368,900	3,758,200	Residential	7.58E-04
369,000	3,758,200	Worker	8.52E-04
369,100	3,758,200	Worker	8.63E-04
369,200	3,758,200	Worker	7.29E-04
370,300	3,758,200	Sensitive	9.76E-04
370,800	3,758,200	Worker	1.06E-03
370,900	3,758,200	Worker	5.90E-04
371,000	3,758,200	Worker	4.01E-04
371,100	3,758,200	Worker	2.95E-04
371,200	3,758,200	Residential	2.43E-04
371,300	3,758,200	Residential	2.11E-04
366,700	3,758,300	Residential	2.61E-04
366,800	3,758,300	Residential	2.75E-04
366,900	3,758,300	Residential	2.88E-04
367,000	3,758,300	Residential	3.03E-04
367,100	3,758,300	Residential	3.08E-04
367,200	3,758,300	Residential	3.22E-04
367,300	3,758,300	Residential	3.55E-04
367,400	3,758,300	Sensitive	3.88E-04
367,500	3,758,300	Worker	4.38E-04
367,600	3,758,300	Residential	5.00E-04

Table H.10-2 Total Project Acute Hazard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
367,700	3,758,300	Residential	5.82E-04
367,800	3,758,300	Sensitive	4.71E-04
367,900	3,758,300	Sensitive	4.32E-04
368,000	3,758,300	Sensitive	4.42E-04
368,100	3,758,300	Sensitive	4.80E-04
368,200	3,758,300	Residential	4.62E-04
368,300	3,758,300	Residential	4.09E-04
368,400	3,758,300	Residential	4.97E-04
368,500	3,758,300	Residential	5.25E-04
368,600	3,758,300	Sensitive	5.03E-04
368,700	3,758,300	Sensitive	5.76E-04
368,800	3,758,300	Residential	6.72E-04
368,900	3,758,300	Residential	6.46E-04
369,000	3,758,300	Worker	6.20E-04
369,100	3,758,300	Worker	6.19E-04
369,200	3,758,300	Worker	6.30E-04
369,300	3,758,300	Worker	6.59E-04
369,800	3,758,300	Residential	4.40E-04
369,900	3,758,300	Residential	4.39E-04
370,000	3,758,300	Residential	4.63E-04
370,100	3,758,300	Residential	5.19E-04
370,200	3,758,300	Residential	5.72E-04
370,300	3,758,300	Residential	6.48E-04
370,400	3,758,300	Residential	8.16E-04
370,500	3,758,300	Residential	1.01E-03
370,600	3,758,300	Residential	1.11E-03
370,700	3,758,300	Residential	1.02E-03
370,800	3,758,300	Residential	9.45E-04
370,900	3,758,300	Worker	5.95E-04
371,000	3,758,300	Worker	4.60E-04
371,100	3,758,300	Worker	4.14E-04
371,200	3,758,300	Sensitive	3.66E-04
366,900	3,758,400	Residential	2.84E-04
367,000	3,758,400	Residential	2.65E-04
367,100	3,758,400	Residential	2.89E-04
367,200	3,758,400	Residential	2.99E-04
367,300	3,758,400	Residential	3.28E-04
367,400	3,758,400	Residential	3.47E-04
367,500	3,758,400	Worker	3.75E-04
367,600	3,758,400	Residential	4.09E-04
367,700	3,758,400	Residential	4.23E-04
367,800	3,758,400	Sensitive	4.02E-04
367,900	3,758,400	Sensitive	3.88E-04
368,000	3,758,400	Sensitive	3.89E-04
368,100	3,758,400	Sensitive	4.05E-04
368,200	3,758,400	Residential	4.10E-04
368,300	3,758,400	Residential	3.62E-04
368,400	3,758,400	Residential	4.50E-04
368,500	3,758,400	Residential	4.82E-04

Table H.10-2 Total Project Acute Hazard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
368,600	3,758,400	Sensitive	4.80E-04
368,700	3,758,400	Sensitive	5.21E-04
368,800	3,758,400	Residential	5.62E-04
368,900	3,758,400	Worker	4.93E-04
369,000	3,758,400	Worker	4.84E-04
369,100	3,758,400	Worker	5.01E-04
369,200	3,758,400	Worker	5.42E-04
369,300	3,758,400	Worker	5.88E-04
369,800	3,758,400	Residential	4.04E-04
369,900	3,758,400	Residential	4.05E-04
370,000	3,758,400	Residential	4.21E-04
370,100	3,758,400	Residential	5.94E-04
370,200	3,758,400	Residential	4.76E-04
370,300	3,758,400	Residential	5.20E-04
370,400	3,758,400	Residential	5.57E-04
370,500	3,758,400	Residential	5.50E-04
370,600	3,758,400	Residential	6.58E-04
370,700	3,758,400	Residential	5.66E-04
370,800	3,758,400	Residential	5.54E-04
370,900	3,758,400	Worker	5.41E-04
371,000	3,758,400	Worker	5.19E-04
371,100	3,758,400	Worker	5.18E-04
371,200	3,758,400	Worker	4.63E-04
367,400	3,758,500	Residential	3.11E-04
367,500	3,758,500	Worker	3.44E-04
367,600	3,758,500	Worker	3.42E-04
367,700	3,758,500	Worker	3.41E-04
367,800	3,758,500	Worker	3.36E-04
367,900	3,758,500	Sensitive	3.49E-04
368,000	3,758,500	Sensitive	3.50E-04
368,100	3,758,500	Sensitive	3.55E-04
368,200	3,758,500	Sensitive	3.66E-04
368,600	3,758,500	Residential	4.68E-04
368,700	3,758,500	Residential	4.78E-04
368,800	3,758,500	Worker	4.58E-04
368,900	3,758,500	Worker	4.62E-04
369,000	3,758,500	Worker	4.46E-04
369,100	3,758,500	Worker	4.28E-04
369,200	3,758,500	Worker	5.06E-04
369,300	3,758,500	Worker	5.02E-04
369,800	3,758,500	Residential	3.85E-04
369,900	3,758,500	Residential	3.94E-04
370,000	3,758,500	Residential	4.00E-04
370,100	3,758,500	Residential	4.15E-04
370,200	3,758,500	Residential	4.17E-04
370,300	3,758,500	Residential	4.22E-04
370,400	3,758,500	Residential	4.12E-04
370,500	3,758,500	Residential	4.11E-04
370,600	3,758,500	Residential	4.20E-04

Table H.10-2 Total Project Acute Hazard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
370,700	3,758,500	Residential	4.17E-04
370,800	3,758,500	Residential	3.89E-04
370,900	3,758,500	Worker	4.68E-04
371,000	3,758,500	Worker	5.19E-04
371,100	3,758,500	Worker	5.63E-04
371,200	3,758,500	Worker	4.88E-04
367,500	3,758,600	Residential	3.43E-04
367,600	3,758,600	Residential	3.24E-04
367,700	3,758,600	Sensitive	2.98E-04
367,800	3,758,600	Worker	3.49E-04
367,900	3,758,600	Worker	3.61E-04
368,000	3,758,600	Sensitive	3.15E-04
368,100	3,758,600	Sensitive	3.20E-04
368,800	3,758,600	Worker	4.20E-04
368,900	3,758,600	Worker	3.98E-04
369,000	3,758,600	Worker	3.78E-04
369,100	3,758,600	Worker	3.68E-04
369,200	3,758,600	Worker	3.94E-04
369,300	3,758,600	Worker	4.18E-04
369,400	3,758,600	Residential	4.32E-04
369,500	3,758,600	Residential	4.90E-04
369,600	3,758,600	Residential	4.67E-04
369,700	3,758,600	Residential	4.36E-04
369,800	3,758,600	Residential	4.76E-04
369,900	3,758,600	Residential	5.13E-04
370,000	3,758,600	Residential	5.01E-04
370,100	3,758,600	Residential	3.74E-04
370,200	3,758,600	Residential	3.74E-04
370,300	3,758,600	Residential	3.69E-04
370,400	3,758,600	Residential	3.43E-04
370,500	3,758,600	Residential	3.31E-04
370,600	3,758,600	Residential	2.96E-04
370,700	3,758,600	Residential	3.51E-04
370,800	3,758,600	Residential	3.69E-04
370,900	3,758,600	Residential	4.33E-04
371,000	3,758,600	Worker	4.95E-04
371,100	3,758,600	Residential	3.99E-04
367,600	3,758,700	Residential	2.83E-04
367,700	3,758,700	Residential	2.85E-04
367,800	3,758,700	Residential	3.16E-04
369,000	3,758,700	Residential	3.28E-04
369,100	3,758,700	Residential	3.47E-04
369,200	3,758,700	Residential	4.16E-04
369,300	3,758,700	Residential	4.05E-04
369,400	3,758,700	Residential	4.09E-04
369,500	3,758,700	Residential	4.22E-04
369,600	3,758,700	Residential	4.38E-04
369,700	3,758,700	Residential	4.02E-04
369,800	3,758,700	Residential	4.54E-04

Table H.10-2 Total Project Acute Hazard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
369,900	3,758,700	Residential	5.20E-04
370,000	3,758,700	Residential	4.94E-04
370,100	3,758,700	Residential	4.58E-04
370,200	3,758,700	Sensitive	3.32E-04
370,300	3,758,700	Residential	3.09E-04
370,400	3,758,700	Residential	3.10E-04
370,500	3,758,700	Residential	3.12E-04
370,600	3,758,700	Residential	2.78E-04
370,700	3,758,700	Residential	3.21E-04
370,800	3,758,700	Residential	3.47E-04
370,900	3,758,700	Residential	3.42E-04
371,000	3,758,700	Worker	4.15E-04
369,000	3,758,800	Residential	3.24E-04
369,100	3,758,800	Residential	3.75E-04
369,200	3,758,800	Residential	4.36E-04
369,300	3,758,800	Residential	4.23E-04
369,400	3,758,800	Residential	4.01E-04
369,500	3,758,800	Residential	3.66E-04
369,600	3,758,800	Residential	3.75E-04
369,700	3,758,800	Residential	3.85E-04
369,800	3,758,800	Residential	4.46E-04
369,900	3,758,800	Residential	4.60E-04
370,000	3,758,800	Residential	4.67E-04
370,100	3,758,800	Residential	4.25E-04
370,200	3,758,800	Sensitive	3.35E-04
369,100	3,758,900	Residential	3.68E-04
369,200	3,758,900	Residential	4.23E-04
369,300	3,758,900	Residential	4.03E-04
369,400	3,758,900	Residential	3.65E-04
369,500	3,758,900	Residential	3.54E-04
369,600	3,758,900	Residential	3.28E-04
369,700	3,758,900	Residential	3.42E-04
369,800	3,758,900	Residential	4.08E-04
369,900	3,758,900	Residential	4.23E-04
370,000	3,758,900	Residential	4.02E-04
370,100	3,758,900	Residential	3.41E-04
369,200	3,759,000	Residential	3.83E-04
369,300	3,759,000	Residential	3.64E-04
369,400	3,759,000	Residential	3.51E-04
369,500	3,759,000	Residential	3.32E-04
369,600	3,759,000	Residential	3.09E-04
369,700	3,759,000	Residential	3.23E-04
369,800	3,759,000	Residential	3.57E-04
369,900	3,759,000	Residential	3.74E-04
370,000	3,759,000	Residential	3.17E-04
370,755	3,757,840	Fenceline	5.53E-04
370,824	3,757,856	Fenceline	4.69E-04
370,910	3,757,807	Fenceline	4.07E-04
370,975	3,757,834	Fenceline	3.84E-04

Table H.10-2 Total Project Acute Hazard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
370,900	3,757,862	Fenceline	4.65E-04
370,822	3,757,910	Fenceline	5.55E-04
370,796	3,758,005	Fenceline	9.39E-04
370,796	3,758,105	Fenceline	1.10E-03
370,797	3,758,205	Fenceline	1.08E-03
370,770	3,758,280	Fenceline	1.12E-03
370,670	3,758,281	Fenceline	1.18E-03
370,570	3,758,283	Fenceline	1.31E-03
370,470	3,758,284	Fenceline	1.14E-03
370,438	3,758,237	Fenceline	1.28E-03
370,358	3,758,203	Fenceline	1.26E-03
370,265	3,758,168	Fenceline	1.09E-03
370,227	3,758,230	Fenceline	7.17E-04
370,185	3,758,286	Fenceline	5.81E-04
370,085	3,758,282	Fenceline	5.19E-04
369,985	3,758,283	Fenceline	4.73E-04
369,885	3,758,284	Fenceline	4.52E-04
369,787	3,758,287	Fenceline	4.45E-04
369,788	3,758,387	Fenceline	4.06E-04
369,789	3,758,487	Fenceline	3.84E-04
369,783	3,758,580	Fenceline	3.84E-04
369,683	3,758,581	Fenceline	4.76E-04
369,583	3,758,582	Fenceline	4.67E-04
369,483	3,758,583	Fenceline	4.88E-04
369,388	3,758,579	Fenceline	4.42E-04
369,387	3,758,479	Fenceline	5.28E-04
369,386	3,758,379	Fenceline	6.03E-04
369,330	3,758,305	Fenceline	6.69E-04
369,253	3,758,241	Fenceline	7.33E-04
369,246	3,758,171	Fenceline	7.53E-04
369,310	3,758,094	Fenceline	7.46E-04
369,381	3,758,024	Fenceline	6.92E-04
369,344	3,757,941	Fenceline	9.19E-04
369,280	3,758,015	Fenceline	1.04E-03
369,216	3,758,092	Fenceline	1.10E-03
369,152	3,758,165	Fenceline	9.92E-04
369,067	3,758,112	Fenceline	1.22E-03
369,002	3,758,112	Fenceline	1.14E-03
368,949	3,758,161	Fenceline	9.63E-04
368,865	3,758,108	Fenceline	9.45E-04
368,780	3,758,055	Fenceline	9.16E-04
368,696	3,758,001	Fenceline	9.30E-04
368,608	3,757,953	Fenceline	9.51E-04
368,534	3,757,957	Fenceline	9.59E-04
368,441	3,757,965	Fenceline	1.03E-03
368,341	3,757,966	Fenceline	1.09E-03
368,241	3,757,977	Fenceline	1.10E-03
368,147	3,758,010	Fenceline	1.02E-03
368,055	3,758,049	Fenceline	1.05E-03

Table H.10-2 Total Project Acute Hazard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
367,963	3,758,088	Fenceline	1.05E-03
367,871	3,758,128	Fenceline	9.48E-04
367,821	3,758,186	Fenceline	7.90E-04
367,730	3,758,221	Fenceline	7.82E-04
367,724	3,758,137	Fenceline	9.26E-04
367,741	3,758,039	Fenceline	1.10E-03
367,727	3,757,942	Fenceline	1.16E-03
367,704	3,757,849	Fenceline	1.24E-03
367,610	3,757,869	Fenceline	9.53E-04
367,528	3,757,879	Fenceline	8.72E-04
367,480	3,757,967	Fenceline	7.93E-04
367,412	3,757,986	Fenceline	7.08E-04
367,346	3,757,925	Fenceline	8.88E-04
367,257	3,757,913	Fenceline	8.16E-04
367,162	3,757,938	Fenceline	8.22E-04
367,072	3,757,944	Fenceline	7.56E-04
366,985	3,757,894	Fenceline	7.10E-04
366,976	3,757,823	Fenceline	7.71E-04
367,027	3,757,737	Fenceline	1.07E-03
367,076	3,757,650	Fenceline	1.20E-03
367,165	3,757,636	Fenceline	1.13E-03
367,265	3,757,638	Fenceline	1.40E-03
367,365	3,757,639	Fenceline	1.28E-03
367,465	3,757,640	Fenceline	1.28E-03
367,565	3,757,642	Fenceline	1.30E-03
367,665	3,757,648	Fenceline	1.25E-03
367,763	3,757,658	Fenceline	1.47E-03
367,795	3,757,593	Fenceline	1.14E-03
367,894	3,757,604	Fenceline	1.27E-03
367,994	3,757,615	Fenceline	1.24E-03
368,093	3,757,626	Fenceline	1.31E-03
368,192	3,757,637	Fenceline	1.26E-03
368,292	3,757,647	Fenceline	9.61E-04
368,391	3,757,658	Fenceline	7.70E-04
368,491	3,757,669	Fenceline	6.47E-04
368,590	3,757,680	Fenceline	5.97E-04
368,689	3,757,691	Fenceline	5.53E-04
368,789	3,757,702	Fenceline	5.55E-04
368,888	3,757,712	Fenceline	5.57E-04
368,988	3,757,723	Fenceline	5.63E-04
369,087	3,757,734	Fenceline	5.58E-04
369,186	3,757,745	Fenceline	5.52E-04
369,286	3,757,756	Fenceline	5.33E-04
369,385	3,757,767	Fenceline	5.51E-04
369,485	3,757,777	Fenceline	5.14E-04
369,584	3,757,788	Fenceline	4.96E-04
369,882	3,757,821	Fenceline	5.04E-04
369,982	3,757,832	Fenceline	5.23E-04
370,081	3,757,843	Fenceline	5.65E-04

Table H.10-2 Total Project Acute Hazard Index (Construction and Operation) at Modeled Receptors

UTMx	UTMy	Receptor Type	Acute Hazard Index
370,181	3,757,847	Fenceline	5.96E-04
370,281	3,757,846	Fenceline	6.13E-04
370,381	3,757,845	Fenceline	6.28E-04
370,481	3,757,843	Fenceline	6.28E-04
370,581	3,757,842	Fenceline	5.99E-04
370,681	3,757,841	Fenceline	6.11E-04
371,014	3,757,908	Sensitive	4.10E-04
370,977	3,758,096	Sensitive	5.32E-04
371,426	3,758,504	Sensitive	3.74E-04
370,982	3,758,117	Sensitive	4.97E-04
370,977	3,758,085	Sensitive	5.41E-04
367,771	3,758,595	Sensitive	3.37E-04
371,007	3,758,088	Sensitive	4.94E-04
367,714	3,758,610	Sensitive	3.01E-04
370,224	3,758,180	Sensitive	8.54E-04
370,157	3,758,889	Sensitive	3.44E-04
368,686	3,758,355	Sensitive	5.34E-04
367,401	3,758,280	Sensitive	3.97E-04
367,526	3,758,001	Sensitive	6.77E-04
370,227	3,758,395	Sensitive	4.88E-04
367,944	3,758,519	Sensitive	3.45E-04
368,310	3,758,513	Sensitive	3.50E-04
369,745	3,758,680	Sensitive	4.26E-04
370,009	3,758,321	Sensitive	4.91E-04
370,058	3,758,870	Sensitive	3.99E-04

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